IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA (Alexandria Division)

-----:

JODI C. MAHDAVI,

Plaintiff,

vs. : Case No.

: 1:14-cv-0648

NEXTGEAR CAPITAL, INC.

:

and :

P.A.R. SERVICES, INC., :

•

Defendants. :

Arlington, Virginia

1

Wednesday, November 12, 2014

Deposition of:

JODI C. MAHDAVI

called for oral examination by counsel for

Defendant, pursuant to notice, at the law offices

of Levine, Daniels & Allnutt, 5311 Lee Highway,

Arlington, Virginia, before Christy McGee, CSR, of

Capital Reporting Company, a Notary Public in and

for the Commonwealth of Virginia, beginning at

10:00 a.m., when were present on behalf of the

respective parties:

(866) 448 - DEPO www.CapitalReportingCompany.com © 2014

		_		$\overline{}$
	2			4
1 2 3 4 5 6 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 20 21	A P P E A R A N C E S On behalf of Plaintiff: JONATHAN E. LEVINE, ESQUIRE Levine, Daniels & Allnutt, PLLC Heritage Square, 5311 Lee Highway Arlington, Virginia 22207 (703) 525-2668 On behalf of Defendant, NextGear: JAMES BRAGDON, ESQUIRE Gallagher, Evelius & Jones, LLP 218 North Charles Street, Suite 400 Baltimore, Maryland 21201 (410) 347-1275 On behalf of Defendant, P.A.R.: JAMES N. MARKELS, ESQUIRE Jackson & Campbell 1120 Twentieth Street, N.W., South Tower Washington, D.C. 20036-3437 (202) 457-1610 *****	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	PROCEEDINGS WHEREUPON, JODI C. MAHDAVI called as a witness, and having been first duly sworn, was examined and testified as follows: EXAMINATION BY COUNSEL FOR DEFENDANT, NextGear BY MR. BRAGDON: Q Hi, Ms. Mahdavi. My name is James Bragdon and I represent NextGear. Have you had your deposition taken before? A No. Q Okay. I'll give you some general rules, and I'm sure Mr. Levine has laid out how this is going to go, but I'll be asking you questions about the claim that you've brought against NextGear. If you have we don't want to you speculate on any answers, so if you don't know, I don't know is a fine answer. If you do answer a question, it's going to come across that you do understand the question and that you know the answer to the	
21 22		21	question. If you don't understand a question, just	
		22	please ask me to clarify. Otherwise, again, it	
	3			5
1 2 3 4 5 6 7 8 9 10	EXAMINATION BY: PAGE Counsel for Defendant, NextGear 4 Counsel for Defendant, P.A.R. 59/90 Counsel for Plaintiff 89 MAHDAVI DEPOSITION EXHIBITS: * PAGE 1 Answers to P.A.R. 8 2 Answers to NextGear 8	1 2 3 4 5 6 7 8 9 10	will if you don't ask for clarification, it will appear as though you did understand the question. If you need a break at any time, please let me know. And for the court reporter's sake, let's let each other both I'll try to let you finish your answers if you let my finish my questions. Does all that sound fair? A Uh-huh. MR. MARKELS: Just one other thing, uh-huhs and so on, we have a court reporter here who's going to be taking down the audio and making	
12 13 14 15 16 17 18 19 20 21 22	3 Document Production 8 (* Exhibits retained by Counsel, Mr. Bragdon.)	12 13 14 15 16 17 18 19 20 21 22	a transcript. We'll need you to vocalize answers, so yes and no. Headshakes, nods, that sort of thing doesn't help us. So if you could instead of uh-huhs just say yes or no, that will be better for the court reporter to take down what your answer is. THE WITNESS: Okay. BY MR. BRAGDON: Q Are you on any medications today that would prohibit you from giving full and truthful answers?	

		iviaridavi, joa	_		
		6			8
1	Δ	No.		MR. BRAGDON: I'm going to mark your	
2	Q	Are you currently employed?	2	Answers to Interrogatories as Exhibits 1 and 2.	
3	`	Yes.	3	(Mahdavi Deposition Exhibit Numbers 1 and	
4	Q	And what is your job?	4	2 were marked for identification.)	
5	•		5	BY MR. BRAGDON:	
6	Q	And where do you work?	6	Q Can you just generally review these	
7	A	Palm Management Corporation.	7	documents and take your time and verify whether	
8	Q	And is that a staffing agency?	8	these are your answers to NextGear, which I think	
9		No, it's a management company.	٥	is marked as 2, and your supplemental answer to	
10	_	So do you work for multiple clients?	10	P.A.R. Services, which I think is marked as 1.	
11	Q A		111	MR. BRAGDON: Can you mark this as 3?	
12	_	Do you work at multiple locations?	12	(Mahdavi Deposition Exhibit Number 3	
13	Q	No.	13	was marked for identification.)	
	_		I	BY MR. BRAGDON:	
14	Q	And where is your office located?	14		
15	_	Washington, D.C. And what's the address of your employer?	I	Q Do they appear to be accurate copies of	
16	Q		16	the interrogatories you reviewed and signed?	
17	A	1730 Rhode Island Avenue.	17	A Yes.	
18	Q	, , , ,	18	Q Is there anything specific that comes to	
19	•	sibilities are?	19	mind on review of changes you would make or	
20		I review financial statements and I	20	additions you would make?	
21	-	rise a staff of accountants.	21	A No.	
22	Q	And can you briefly describe your	22	Q Is it correct were you involved in the	
		7			9
1	aduent	ional background?		responses to the request for production of	
2		I have a CPA.	$\frac{1}{2}$	documents as well?	
$\frac{1}{3}$		And where was your do you have an	$\frac{2}{3}$	A Yes.	
l .		grad degree?	$\begin{bmatrix} 3 \\ 4 \end{bmatrix}$	Q Can you describe what you did to look for	
4 5		Uh-huh.	5	responsive documents? Where did you go to look for	
6	0	And where was that from?	$\begin{bmatrix} 3 \\ 6 \end{bmatrix}$	the documents you produced?	
7	A		7	A I asked my husband for some.	
١.,	_	And what was your major in undergrad?		Q And did you have any personal files that	
8 9	Q A	Business.	8 9	you had documents in?	
10	_	And what is your home address?	10	A Bank statements.	
11	Q A	915 Fairway Drive, Vienna, Virginia.	11		
12	Q	And other than that, do you own any other	12	Q Did you review any of your e-mail communications?	
13	proper		13	A I didn't have any e-mail communications.	
14		Yes.	14		
15			15	Q Do you use e-mail? A Yes.	
		How many approximately do you own or have erest in, I should say?	16		
16 17			17	Q And do you have a work and personal account?	
	_	And are those residential properties?	1		
18	Q	And are those residential properties?	18	A I don't have a personal account. I have a work e-mail.	
19		Yes.	19		
20		And are they located I guess, what	20	Q And what is the that's called Palm	
21		are they located in?	21	Communication or what's name of your company again?	
22	А	Virginia and Maryland.	22	A The Palm.	

	iviariaavi, joa.			
	10			12
1	Q Palm. Palm Management?	1	husband, you would delete those?	
2	A Uh-huh.	2	A Yes.	
3	Q What's the domain name of those e-mails?	3	Q And has that continued while this	
4	A The Palm.	4	litigation has been pending?	
5	Q Have you what's your general practice	5	A Yes.	
6	for storing e-mails through your work e-mail	6	Q Have you ever e-mailed anyone about	
7	account?	7	anything related to this litigation?	
8	A I don't keep personal e-mails on my work	8	A No.	
9	e-mail.	9	Q Do you keep a calendar?	
10	Q And so you don't have any personal e-mail	10	A No.	
11	account?	11	Q Do you use Outlook calendar?	
12	A I don't have a personal e-mail account,	12	A No.	
13	no.	13	Q Do you have any method for keeping track	
14	Q So it's correct that do you correspond		of personal appointments or professional	
15	with your husband with your work e-mail?		appointments?	
16	A I do, yes.	16	A I have a paper calendar on my desk.	
17	Q Do you correspond with friends and family	17	Q And do you use that paper calendar to	
18	members through your work account?		keep track of what your work appointments are?	
19	A I do.	19	A I don't really have work appointments.	
20	Q Is it like an Outlook account?	20	Q Okay. So do you keep track of, I guess,	
21	A It is Outlook.	ı	social or personal appointments on the work	
22	Q Do you I guess your e-mail is kept and		calendar?	
		l		
	11			13
		1	A Uh-huh.	13
1 2	stored on the work computer; is that correct? A Uh-huh.	1 2		13
	stored on the work computer; is that correct? A Uh-huh.	2	MR. LEVINE: Try to, for the court	13
2	stored on the work computer; is that correct?	2	MR. LEVINE: Try to, for the court reporter, give yes or no.	13
2 3	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes.	2 3 4	MR. LEVINE: Try to, for the court	13
2 3 4	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes.	2 3 4	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON:	13
2 3 4 5	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them?	2 3 4 5 6	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends	13
2 3 4 5 6	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store	2 3 4 5 6	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family?	13
2 3 4 5 6 7	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes.	2 3 4 5 6 7	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family?	13
2 3 4 5 6 7 8	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes?	2 3 4 5 6 7 8 9	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes.	13
2 3 4 5 6 7 8 9	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes? A Not usually.	2 3 4 5 6 7 8 9	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes. Q Do you send is that a frequent way of	13
2 3 4 5 6 7 8 9	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes? A Not usually. Q Do you keep separate folders or do you	2 3 4 5 6 7 8 9	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes. Q Do you send is that a frequent way of communicating with your friends and family?	13
2 3 4 5 6 7 8 9 10 11	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes? A Not usually. Q Do you keep separate folders or do you just keep your e-mails in your inbox?	2 3 4 5 6 7 8 9 10 11 12	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes. Q Do you send is that a frequent way of communicating with your friends and family? A Yes.	13
2 3 4 5 6 7 8 9 10 11 12	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes? A Not usually. Q Do you keep separate folders or do you just keep your e-mails in your inbox? A Just in my inbox.	2 3 4 5 6 7 8 9 10 11 12	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes. Q Do you send is that a frequent way of communicating with your friends and family? A Yes. Q And do you use text messages to discuss	13
2 3 4 5 6 7 8 9 10 11 12 13	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes? A Not usually. Q Do you keep separate folders or do you just keep your e-mails in your inbox? A Just in my inbox. Q Have you continued to delete e-mails over	2 3 4 5 6 7 8 9 10 11 12 13	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes. Q Do you send is that a frequent way of communicating with your friends and family? A Yes. Q And do you use text messages to discuss your schedule or where you are for the day?	13
2 3 4 5 6 7 8 9 10 11 12 13 14	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes? A Not usually. Q Do you keep separate folders or do you just keep your e-mails in your inbox? A Just in my inbox. Q Have you continued to delete e-mails over the last six months or have you stopped deleting	2 3 4 5 6 7 8 9 10 11 12 13 14 15	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes. Q Do you send is that a frequent way of communicating with your friends and family? A Yes. Q And do you use text messages to discuss your schedule or where you are for the day? A Yes.	13
2 3 4 5 6 7 8 9 10 11 12 13 14 15	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes? A Not usually. Q Do you keep separate folders or do you just keep your e-mails in your inbox? A Just in my inbox. Q Have you continued to delete e-mails over the last six months or have you stopped deleting them?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes. Q Do you send is that a frequent way of communicating with your friends and family? A Yes. Q And do you use text messages to discuss your schedule or where you are for the day? A Yes. Q Ms. Mahdavi, are you married to Navid	13
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes? A Not usually. Q Do you keep separate folders or do you just keep your e-mails in your inbox? A Just in my inbox. Q Have you continued to delete e-mails over the last six months or have you stopped deleting them? A I delete some.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes. Q Do you send is that a frequent way of communicating with your friends and family? A Yes. Q And do you use text messages to discuss your schedule or where you are for the day? A Yes. Q Ms. Mahdavi, are you married to Navid Alex Mahdavi?	13
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes? A Not usually. Q Do you keep separate folders or do you just keep your e-mails in your inbox? A Just in my inbox. Q Have you continued to delete e-mails over the last six months or have you stopped deleting them? A I delete some. Q Is there a practice you have for deciding	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes. Q Do you send is that a frequent way of communicating with your friends and family? A Yes. Q And do you use text messages to discuss your schedule or where you are for the day? A Yes. Q Ms. Mahdavi, are you married to Navid Alex Mahdavi? A Yes.	13
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes? A Not usually. Q Do you keep separate folders or do you just keep your e-mails in your inbox? A Just in my inbox. Q Have you continued to delete e-mails over the last six months or have you stopped deleting them? A I delete some. Q Is there a practice you have for deciding which e-mails to delete and which ones to keep?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes. Q Do you send is that a frequent way of communicating with your friends and family? A Yes. Q And do you use text messages to discuss your schedule or where you are for the day? A Yes. Q Ms. Mahdavi, are you married to Navid Alex Mahdavi? A Yes. Q When were you married to him?	13
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes? A Not usually. Q Do you keep separate folders or do you just keep your e-mails in your inbox? A Just in my inbox. Q Have you continued to delete e-mails over the last six months or have you stopped deleting them? A I delete some. Q Is there a practice you have for deciding which e-mails to delete and which ones to keep? A If it's work-related, I'll keep it. I	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes. Q Do you send is that a frequent way of communicating with your friends and family? A Yes. Q And do you use text messages to discuss your schedule or where you are for the day? A Yes. Q Ms. Mahdavi, are you married to Navid Alex Mahdavi? A Yes. Q When were you married to him? A September 2005.	13
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	stored on the work computer; is that correct? A Uh-huh. Q Does it also come to your phone? A Yes. Q Do you delete e-mails after reading them? A Sometimes. Q Have you continued your do you store e-mails after reading them sometimes? A Not usually. Q Do you keep separate folders or do you just keep your e-mails in your inbox? A Just in my inbox. Q Have you continued to delete e-mails over the last six months or have you stopped deleting them? A I delete some. Q Is there a practice you have for deciding which e-mails to delete and which ones to keep? A If it's work-related, I'll keep it. I mean, if I don't need it, I don't keep it, no.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	MR. LEVINE: Try to, for the court reporter, give yes or no. THE WITNESS: Oh, I'm sorry. Yes. BY MR. BRAGDON: Q And then do you text message with friends and family? A Yes. Q Do you send is that a frequent way of communicating with your friends and family? A Yes. Q And do you use text messages to discuss your schedule or where you are for the day? A Yes. Q Ms. Mahdavi, are you married to Navid Alex Mahdavi? A Yes. Q When were you married to him? A September 2005. Q Does he live with you in Vienna?	13

	ivialidavi, jod	1		
	14			16
1	A I don't know.	1	Q And do you Ms. Nozary as well?	
2	Q Was he working at Beltway Auto before?	2	A I know of her, yes.	
3	A Yes.	3	Q Had you ever met them before?	
4	Q And do you know what his job	4	A Yes.	
5	responsibilities there were?	5	O And when was that?	
6	A Responsibilities, no.	6	A On several occasions maybe a year prior.	
7	Q Did you know what his job title was?	7	Q A year ago from around now?	
8	A Manager.	8	A Uh-huh.	
9	Q Did you have even a general understanding	9	Q Do they live in Virginia?	
10	of what he did at Beltway Auto?	10	A Yes.	
11	A Sold cars.	11	Q And I think I saw in your interrogatories	
12	Q And do you know when he started working	12	that their daughter babysitted for you from time to	
13	at Beltway Auto?	13	time?	
14	A January of 2010.	14	A Yes.	
15	Q What was your husband's previous job	15	Q Did you spend time with Mr. Molavi and	
16	before working at Beltway Auto?	16	Ms. Nozary socially?	
17	MR. LEVINE: Objection, relevance.	17	A No.	
18	BY MR. BRAGDON:	18	Q Do you recall how Mr. Mahdavi came to be	
19	Q You can answer unless he tells you not	19	employed by Beltway Auto?	
20	to. He's preserving if there's an objection to	20	A No.	
21	my question, he'll make a record.	21	Q Did he know Mr. Molavi or Ms. Nozary	
22	A He worked for another auto company in	22	before being hired?	
		1		
	15			17
1	Maryland, Auto Source.	1	A Not that I'm aware of.	
2	Q And do you know his dates of employment	2	Q Other than for the incarceration in 2008,	
3	there?	3	2000 1 M. M. I. I	
4		1 3	2009, does Mr. Mahdavi have any criminal	
1	A No.	4	convictions you're aware of?	
5	Q Since you were married, have you ever	Ι.	convictions you're aware of? A No.	
6	Q Since you were married, have you ever lived apart from Mr. Mahdavi?	4	convictions you're aware of? A No. Q And we ask this of every deponent, but do	
6 7	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes.	4 5	convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor	
6	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was	4 5	convictions you're aware of? A No. Q And we ask this of every deponent, but do	
6 7	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009;	4 5 6 7 8 9	convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No.	
6 7 8 9 10	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct?	4 5 6 7 8	convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in	
6 7 8 9 10 11	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct? A Yes.	4 5 6 7 8 9 10 11	convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in another a civil lawsuit?	
6 7 8 9 10 11 12	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct? A Yes. Q Other than that, have you ever lived	4 5 6 7 8 9 10 11 12	convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in another a civil lawsuit? A Civil?	
6 7 8 9 10 11 12 13	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct? A Yes. Q Other than that, have you ever lived apart from him?	4 5 6 7 8 9 10 11 12 13	convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in another a civil lawsuit? A Civil? Q Other than this case?	
6 7 8 9 10 11 12 13 14	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct? A Yes. Q Other than that, have you ever lived apart from him? A No.	4 5 6 7 8 9 10 11 12 13 14	convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in another a civil lawsuit? A Civil? Q Other than this case? A Is that the tenant?	
6 7 8 9 10 11 12 13 14 15	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct? A Yes. Q Other than that, have you ever lived apart from him? A No. Q Do you know what Mr. Mahdavi's salary was	4 5 6 7 8 9 10 11 12 13 14 15	convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in another a civil lawsuit? A Civil? Q Other than this case? A Is that the tenant? Q Okay. So you've been involved in some	
6 7 8 9 10 11 12 13 14 15 16	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct? A Yes. Q Other than that, have you ever lived apart from him? A No. Q Do you know what Mr. Mahdavi's salary was at BW Auto?	4 5 6 7 8 9 10 11 12 13 14 15 16	convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in another a civil lawsuit? A Civil? Q Other than this case? A Is that the tenant? Q Okay. So you've been involved in some landlord/tenant actions?	
6 7 8 9 10 11 12 13 14 15 16 17	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct? A Yes. Q Other than that, have you ever lived apart from him? A No. Q Do you know what Mr. Mahdavi's salary was at BW Auto? A No.	4 5 6 7 8 9 10 11 12 13 14 15 16 17	convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in another a civil lawsuit? A Civil? Q Other than this case? A Is that the tenant? Q Okay. So you've been involved in some landlord/tenant actions? A Yes.	
6 7 8 9 10 11 12 13 14 15 16 17 18	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct? A Yes. Q Other than that, have you ever lived apart from him? A No. Q Do you know what Mr. Mahdavi's salary was at BW Auto? A No. Q And you knew the principals or the owners	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in another a civil lawsuit? A Civil? Q Other than this case? A Is that the tenant? Q Okay. So you've been involved in some landlord/tenant actions? A Yes. Q And those are for the properties you own?	
6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct? A Yes. Q Other than that, have you ever lived apart from him? A No. Q Do you know what Mr. Mahdavi's salary was at BW Auto? A No. Q And you knew the principals or the owners of BW Auto; is that correct?	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in another a civil lawsuit? A Civil? Q Other than this case? A Is that the tenant? Q Okay. So you've been involved in some landlord/tenant actions? A Yes. Q And those are for the properties you own? A Yes.	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct? A Yes. Q Other than that, have you ever lived apart from him? A No. Q Do you know what Mr. Mahdavi's salary was at BW Auto? A No. Q And you knew the principals or the owners of BW Auto; is that correct? A The no.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in another a civil lawsuit? A Civil? Q Other than this case? A Is that the tenant? Q Okay. So you've been involved in some landlord/tenant actions? A Yes. Q And those are for the properties you own? A Yes. Q The ten properties you own, do you know	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct? A Yes. Q Other than that, have you ever lived apart from him? A No. Q Do you know what Mr. Mahdavi's salary was at BW Auto? A No. Q And you knew the principals or the owners of BW Auto; is that correct? A The no. Q Who were your husband's bosses?	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in another a civil lawsuit? A Civil? Q Other than this case? A Is that the tenant? Q Okay. So you've been involved in some landlord/tenant actions? A Yes. Q And those are for the properties you own? A Yes. Q The ten properties you own, do you know how many are in Maryland and how many are in	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q Since you were married, have you ever lived apart from Mr. Mahdavi? A Yes. Q Has he ever lived Mr. Mahdavi was incarcerated for a period of time in 2008 and 2009; is that correct? A Yes. Q Other than that, have you ever lived apart from him? A No. Q Do you know what Mr. Mahdavi's salary was at BW Auto? A No. Q And you knew the principals or the owners of BW Auto; is that correct? A The no.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Convictions you're aware of? A No. Q And we ask this of every deponent, but do you have any criminal convictions other than minor traffic violations? A No. Q And have you ever been involved in another a civil lawsuit? A Civil? Q Other than this case? A Is that the tenant? Q Okay. So you've been involved in some landlord/tenant actions? A Yes. Q And those are for the properties you own? A Yes. Q The ten properties you own, do you know	

	Triandavi, joan	ı —		
	18			20
1	MP LEVINE: Objection relevance	1	A Uh-huh.	
$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$	MR. LEVINE: Objection, relevance. THE WITNESS: I have one in Maryland.	2	A Uh-huh. Q How did you decide on that vehicle?	
3	The others are in Virginia.	$\begin{bmatrix} 2 \\ 3 \end{bmatrix}$	A I saw that it was in a four-door and I	
4	BY MR. BRAGDON:	4	liked it and told my husband.	
5	Q Do you know the address of the one in	5	Q And where did you see it?	
6	Maryland?	6	A I saw it on the road.	
7	A 9913 Montauk Avenue.	7	Q And do you recall when you first saw and	
8	Q And are you the owner of these or do you	8	identified that as a car you would be interested	
9	own them jointly with your husband?	9	in?	
10	A I own them.	10	A Somewhere around the 1st of the year.	
11	Q And can you were they all purchased	11	Q And did he tell you at that time he would	
12	after the year 2000?	12	try to locate one through BW Auto?	
13	A I think so. I don't know for sure.	13	A He just said he would keep an eye out for	
14	Q And how did you purchase these	14	one.	
15	properties?	15	Q And do you recall the first time he told	
16	A With loans.	16	you that he found one?	
17	Q Did you purchase any of them before being	17	A He didn't tell me he found one. He	
18	married to Mr. Mahdavi?	18	brought it home for me to see.	
19	A I think two. It may have been more. It	19	Q And that was on March was that	
20	may have been four before we were married.	20	March 11, 2014?	
21	Q Let's talk a little about the BMW.	21	A No, it was sometime in the beginning of	
22	Before you purchased the BMW, what type of car were	22	March.	
	10			2.1
	19			21
1	you driving?	1	Q And he just brought it home one night?	21
1 2		1 2	Q And he just brought it home one night?A Uh-huh, yes.	21
	you driving?	ı		21
2	you driving? A GLK.	2	A Uh-huh, yes.	21
2 3	you driving? A GLK. Q And where had you purchased that vehicle	2 3	A Uh-huh, yes.Q And did you test-drive it at that time?	21
2 3 4	you driving? A GLK. Q And where had you purchased that vehicle from?	2 3 4	A Uh-huh, yes.Q And did you test-drive it at that time?A Yes.	21
2 3 4 5	you driving? A GLK. Q And where had you purchased that vehicle from? A BW.	2 3 4 5	A Uh-huh, yes.Q And did you test-drive it at that time?A Yes.Q Do you recall what day of the week he	21
2 3 4 5	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is	2 3 4 5 6	 A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? 	21
2 3 4 5 6 7	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct?	2 3 4 5 6 7	 A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. 	21
2 3 4 5 6 7 8	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes.	2 3 4 5 6 7 8	 A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at 	21
2 3 4 5 6 7 8 9	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes. Q And that's through PenFed as well?	2 3 4 5 6 7 8 9	A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at issue in this case?	21
2 3 4 5 6 7 8 9	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes. Q And that's through PenFed as well? A Yes.	2 3 4 5 6 7 8 9	A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at issue in this case? A Yes.	21
2 3 4 5 6 7 8 9 10 11	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes. Q And that's through PenFed as well? A Yes. Q Pentagon Federal. Do you know	2 3 4 5 6 7 8 9 10 11	A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at issue in this case? A Yes. Q And did you drive it over that weekend	21
2 3 4 5 6 7 8 9 10 11 12	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes. Q And that's through PenFed as well? A Yes. Q Pentagon Federal. Do you know approximately when you purchased that vehicle?	2 3 4 5 6 7 8 9 10 11 12	A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at issue in this case? A Yes. Q And did you drive it over that weekend test-drive it, I guess?	21
2 3 4 5 6 7 8 9 10 11 12 13	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes. Q And that's through PenFed as well? A Yes. Q Pentagon Federal. Do you know approximately when you purchased that vehicle? A 2012, I think.	2 3 4 5 6 7 8 9 10 11 12 13	A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at issue in this case? A Yes. Q And did you drive it over that weekend test-drive it, I guess? A Yes, I did.	21
2 3 4 5 6 7 8 9 10 11 12 13	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes. Q And that's through PenFed as well? A Yes. Q Pentagon Federal. Do you know approximately when you purchased that vehicle? A 2012, I think. Q And there was a loan amount still	2 3 4 5 6 7 8 9 10 11 12 13 14	A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at issue in this case? A Yes. Q And did you drive it over that weekend test-drive it, I guess? A Yes, I did. Q And at that time did you decide to	21
2 3 4 5 6 7 8 9 10 11 12 13 14 15	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes. Q And that's through PenFed as well? A Yes. Q Pentagon Federal. Do you know approximately when you purchased that vehicle? A 2012, I think. Q And there was a loan amount still outstanding on that car; is that correct?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at issue in this case? A Yes. Q And did you drive it over that weekend test-drive it, I guess? A Yes, I did. Q And at that time did you decide to purchase the vehicle?	21
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes. Q And that's through PenFed as well? A Yes. Q Pentagon Federal. Do you know approximately when you purchased that vehicle? A 2012, I think. Q And there was a loan amount still outstanding on that car; is that correct? A Yes. Q So do you recall when you first decided to look for a new vehicle?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at issue in this case? A Yes. Q And did you drive it over that weekend test-drive it, I guess? A Yes, I did. Q And at that time did you decide to purchase the vehicle? A Yes.	21
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes. Q And that's through PenFed as well? A Yes. Q Pentagon Federal. Do you know approximately when you purchased that vehicle? A 2012, I think. Q And there was a loan amount still outstanding on that car; is that correct? A Yes. Q So do you recall when you first decided	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at issue in this case? A Yes. Q And did you drive it over that weekend test-drive it, I guess? A Yes, I did. Q And at that time did you decide to purchase the vehicle? A Yes. Q And what were the terms of purchase to	21
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes. Q And that's through PenFed as well? A Yes. Q Pentagon Federal. Do you know approximately when you purchased that vehicle? A 2012, I think. Q And there was a loan amount still outstanding on that car; is that correct? A Yes. Q So do you recall when you first decided to look for a new vehicle? A Somewhere around the beginning of the year, 2014.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at issue in this case? A Yes. Q And did you drive it over that weekend test-drive it, I guess? A Yes, I did. Q And at that time did you decide to purchase the vehicle? A Yes. Q And what were the terms of purchase to be? A The terms? Q Did you work out how you were going to	21
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes. Q And that's through PenFed as well? A Yes. Q Pentagon Federal. Do you know approximately when you purchased that vehicle? A 2012, I think. Q And there was a loan amount still outstanding on that car; is that correct? A Yes. Q So do you recall when you first decided to look for a new vehicle? A Somewhere around the beginning of the year, 2014. Q And how did you decide on the the BMW	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at issue in this case? A Yes. Q And did you drive it over that weekend test-drive it, I guess? A Yes, I did. Q And at that time did you decide to purchase the vehicle? A Yes. Q And what were the terms of purchase to be? A The terms? Q Did you work out how you were going to purchase the vehicle from BW Auto?	21
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	you driving? A GLK. Q And where had you purchased that vehicle from? A BW. Q And you had financed that purchase; is that correct? A Yes. Q And that's through PenFed as well? A Yes. Q Pentagon Federal. Do you know approximately when you purchased that vehicle? A 2012, I think. Q And there was a loan amount still outstanding on that car; is that correct? A Yes. Q So do you recall when you first decided to look for a new vehicle? A Somewhere around the beginning of the year, 2014.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Uh-huh, yes. Q And did you test-drive it at that time? A Yes. Q Do you recall what day of the week he brought it home? A It was a Friday. Q And that's the same white BMW that's at issue in this case? A Yes. Q And did you drive it over that weekend test-drive it, I guess? A Yes, I did. Q And at that time did you decide to purchase the vehicle? A Yes. Q And what were the terms of purchase to be? A The terms? Q Did you work out how you were going to	21

	22			24
1	Q Did you make any payments at that time?	1	a car purchase?	
2	A No.	2	A It was just a savings that I had.	
3	Q Did you sign a contract at that time?	3	Q And was that savings funded by your	
4	A No.	4	salary and your rental properties?	
5	Q Do you recall when you first did sign a	5	A It was just my savings.	
6	contract?	6	Q So what were the sources of your savings	
7	A I did a deposit on the 11th, a transfer	7	at that time?	
8	to deposit on the 11th. I think the contract was	8	A I don't I don't just whatever	
9	on the 16th.	9	savings I had, I would put in that account. I	
10	Q Sure. And I'm not trying to quiz you or	10	don't recall where specifically they	
11	anything, so you should feel free to look at the	11	Q Sure. So I guess the general question	
12	A I think it was the 16th.	12	I'm asking is, when you're building up your savings	
13	Q The 16th of	13	account, what were the sources of income for that	
14	A March.	14	money?	
15	O March?	15	A It would be, you know I don't	
16	A And I transferred the deposit on the	16	really I don't think I'm following. Whatever	
17	11th, which was after he brought the car home.	17	savings that I would have I would put in that	
18	Q Well, I'll say, Ms. Mahdavi, don't feel	18	account, so it would be whatever savings I would	
19	any pressure if you don't remember an exact date	19	have from my employment.	
20	because we'll go through these documents.	20	Q Right. So it would be the source of	
21	A Okay.	21	that savings would be your salary?	
22	Q I shall say, if you do want to go through	22	A And my	
	2 Total out, it you do want to go unough			
	23			25
1	them at any time today, you should feel free to do	1	Q And rental properties?	
2	that if you think it will help you answer a	2	A Yes.	
3	question. And do you recall signing a contract to	3	Q Other than salary and rental properties,	
4	purchase around that time in March?	4	was there anywhere else that you got money for your	
5	A Yes.	5	savings account?	
6	Q Do you recall signing any other	6	A Not that I recall.	
7	documents, other than the contract to purchase, in	7	Q Did Mr. Mahdavi ever give you money for	
8	March?	8	your savings?	
9	A No.	9	A No.	
10	Q And was the deposit you made the \$23,000	10	Q And is it true that from the time	
11	deposit?	11	Mr. Mahdavi brought the vehicle home in early March	
12	A Yes.	12	that it remained on the property, at your house, in	
13	Q And that came from one of your accounts?	13	your possession?	
14	A Yes.	14	A No, he drove it back and forth to work.	
	Q And which account was that, if you can	15	Q Did he drive it back and forth every day	
15	(
15 16	recall?	16	to work?	
1		16 17	to work? A Not every day. I mean, he drives a	
16	recall?	ı		
16 17	recall? A The Bank of America.	17	A Not every day. I mean, he drives a	
16 17 18	recall? A The Bank of America. Q And was that approximately all of the	17 18	A Not every day. I mean, he drives a different car every day.	
16 17 18 19	recall? A The Bank of America. Q And was that approximately all of the money you had in that Bank of America account at	17 18 19	A Not every day. I mean, he drives a different car every day. Q From the lot?	
16 17 18 19 20	recall? A The Bank of America. Q And was that approximately all of the money you had in that Bank of America account at that time?	17 18 19 20	A Not every day. I mean, he drives adifferent car every day.Q From the lot?A Uh-huh.	

	•	1		
	26			28
1 2 3 4 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q When was the first time did he drive it back the Monday after that first weekend in March when you first test-drove it? A The Monday, I honestly can't recall. Q Now, after you signed the contract in March and made the deposit, did you keep the vehicle at that time? A No. Q And what was I guess, what was the plan for when you were going to complete the purchase of the vehicle? A The plan? Well, I was in the process of refinancing rental properties, so that's why my husband had me do the down payment. Q So the idea was that you'd make a down payment in March and then complete the purchase at some later time? A Yes. O And you said this was the way your	1 2 3 4 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	starting to use the vehicle as your own? A I think so. Q Do you recall filling out an application for title? A No. Q Would that have been handled at BW Auto? A Yes. Q And was that your husband who handled that? A I don't know. Q Did you talk to anyone at NextGear while you were going through the process of purchasing this vehicle? A No. Q Did your husband tell you anything about who else was involved in the purchase of your vehicle? A No. O Did you speak when you were before	
19	Q And you said this was the way your	19	Q Did you speak when you were before	
20	husband proposed to structure the deal?	20	purchasing the vehicle, did you speak with anyone	
21	A Yes.	21	at PenFed regarding the financing?	
22	Q So do you recall the first time that you	22	A No.	
		_		
	27			29
1	had the vehicle as your vehicle?	1	Q Did your husband handle that aspect of	29
1 2		1 2	Q Did your husband handle that aspect of the purchase?	29
	had the vehicle as your vehicle? A I want to say it was April some mid-April.	1 2 3	the purchase? A Yes.	29
2	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed	l	the purchase? A Yes. Q Do you recall if your husband told you	29
2 3 4 5	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as	3 4 5	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it	29
2 3 4 5 6	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle?	3 4 5 6	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased?	29
2 3 4 5	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes.	3 4 5	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No.	29
2 3 4 5 6 7 8	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork	3 4 5 6 7 8	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't	29
2 3 4 5 6 7 8 9	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle,	3 4 5 6 7 8 9	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't	29
2 3 4 5 6 7 8 9	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle, was that paperwork you obtained through your	3 4 5 6 7 8 9	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't tell you anything or that you don't recall?	29
2 3 4 5 6 7 8 9 10 11	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle, was that paperwork you obtained through your husband?	3 4 5 6 7 8 9 10 11	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't tell you anything or that you don't recall? A Are you asking before, when I purchased	29
2 3 4 5 6 7 8 9 10 11 12	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle, was that paperwork you obtained through your husband? A Yes, he did the paperwork.	3 4 5 6 7 8 9 10 11 12	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't tell you anything or that you don't recall? A Are you asking before, when I purchased the car?	29
2 3 4 5 6 7 8 9 10 11	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle, was that paperwork you obtained through your husband? A Yes, he did the paperwork. Q So, for example and we can go through	3 4 5 6 7 8 9 10 11	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't tell you anything or that you don't recall? A Are you asking before, when I purchased	29
2 3 4 5 6 7 8 9 10 11 12 13	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle, was that paperwork you obtained through your husband? A Yes, he did the paperwork. Q So, for example and we can go through them if it helps, but if there's typewritten	3 4 5 6 7 8 9 10 11 12 13	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't tell you anything or that you don't recall? A Are you asking before, when I purchased the car? Q Yes.	29
2 3 4 5 6 7 8 9 10 11 12 13 14	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle, was that paperwork you obtained through your husband? A Yes, he did the paperwork. Q So, for example and we can go through	3 4 5 6 7 8 9 10 11 12 13 14	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't tell you anything or that you don't recall? A Are you asking before, when I purchased the car? Q Yes. A He didn't he never said anything.	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle, was that paperwork you obtained through your husband? A Yes, he did the paperwork. Q So, for example and we can go through them if it helps, but if there's typewritten information on a form, was that something he would	3 4 5 6 7 8 9 10 11 12 13 14	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't tell you anything or that you don't recall? A Are you asking before, when I purchased the car? Q Yes. A He didn't he never said anything. Q We have Exhibit 3 before you, which is	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle, was that paperwork you obtained through your husband? A Yes, he did the paperwork. Q So, for example and we can go through them if it helps, but if there's typewritten information on a form, was that something he would have typewritten?	3 4 5 6 7 8 9 10 11 12 13 14 15 16	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't tell you anything or that you don't recall? A Are you asking before, when I purchased the car? Q Yes. A He didn't he never said anything. Q We have Exhibit 3 before you, which is the documents you produced. Can you just you can take your time if you want, but can you flip through these documents and just say generally	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle, was that paperwork you obtained through your husband? A Yes, he did the paperwork. Q So, for example and we can go through them if it helps, but if there's typewritten information on a form, was that something he would have typewritten? A Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't tell you anything or that you don't recall? A Are you asking before, when I purchased the car? Q Yes. A He didn't he never said anything. Q We have Exhibit 3 before you, which is the documents you produced. Can you just you can take your time if you want, but can you flip	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle, was that paperwork you obtained through your husband? A Yes, he did the paperwork. Q So, for example and we can go through them if it helps, but if there's typewritten information on a form, was that something he would have typewritten? A Yes. Q And is it fair to say that he brought the paperwork home for you to sign? A Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't tell you anything or that you don't recall? A Are you asking before, when I purchased the car? Q Yes. A He didn't he never said anything. Q We have Exhibit 3 before you, which is the documents you produced. Can you just you can take your time if you want, but can you flip through these documents and just say generally whether these appear to be all the documents you produced in response?	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle, was that paperwork you obtained through your husband? A Yes, he did the paperwork. Q So, for example and we can go through them if it helps, but if there's typewritten information on a form, was that something he would have typewritten? A Yes. Q And is it fair to say that he brought the paperwork home for you to sign? A Yes. Q Did you complete all the paperwork	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't tell you anything or that you don't recall? A Are you asking before, when I purchased the car? Q Yes. A He didn't he never said anything. Q We have Exhibit 3 before you, which is the documents you produced. Can you just you can take your time if you want, but can you flip through these documents and just say generally whether these appear to be all the documents you produced in response? A Yes.	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	had the vehicle as your vehicle? A I want to say it was April some mid-April. Q And was that after you completed financing that you started using the vehicle as your vehicle? A Yes. Q Now, when you were filling out paperwork for the financing for the purchase of the vehicle, was that paperwork you obtained through your husband? A Yes, he did the paperwork. Q So, for example and we can go through them if it helps, but if there's typewritten information on a form, was that something he would have typewritten? A Yes. Q And is it fair to say that he brought the paperwork home for you to sign? A Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	the purchase? A Yes. Q Do you recall if your husband told you anything about where the BMW came from or how it was purchased? A No. Q And is that that he didn't I didn't ask the question well, but is that that he didn't tell you anything or that you don't recall? A Are you asking before, when I purchased the car? Q Yes. A He didn't he never said anything. Q We have Exhibit 3 before you, which is the documents you produced. Can you just you can take your time if you want, but can you flip through these documents and just say generally whether these appear to be all the documents you produced in response?	29

	iviaridavi, jod.	<u> </u>		
	30			32
1	them by the page numbers that are printed in the	1	A A construction company.	
2	lower right-hand corner, Mahdavi 001.	2	Q And so you decided that, I guess, it's	
3	A Oh, okay.	3	A We'd use the car as a company car.	
4	Q Was this title that you had for the car	4	Q And does the company have a name?	
5	after the purchase?	5	A I'm still speaking with the CPA, my tax	
6	A Yes, this is what came in the mail.	6	CPA, to figure out which type of company I need to	
7	Q And did you say earlier you didn't recall	7	file.	
8	filling out an application for this title; is that	8	Q At what stage was this company formation	
9	correct?	9	in April of 2014?	
10	A Yes.	10	A Well, Montauk Avenue is still under	
11	Q And what's the address I know you	11	construction, so we were in the middle of the	
12	answered this in your interrogatories, but what was	12	project.	
13	this address, the Temple Hills address?	13	Q So is the Montauk so Montauk Avenue is	
14	A This is the address at I have an	14	a is it a residential home?	
15	office here.	15	A I tore it down.	
16	Q And that's is that a client office?	16	Q And you're rebuilding a new home?	
17	A Yes.	17	A Uh-huh.	
18	Q And how frequently are you at that	18	Q So there's no residence there right now;	
19	office?	19	is that correct?	
20	A Every couple months.	20	A No.	
21	Q Is that where this was sent to, this	21	Q And what was the status of that project	
22	Certificate of Title?	22	in April of 2014?	
	31			33
1	31 A I think so. The this is the address	1	A It had been torn down.	33
1 2		1 2	A It had been torn down.Q And so when you say you were forming a	33
	A I think so. The this is the address	l		33
2	A I think so. The this is the address that Maryland has on file, so that's why the title	2	Q And so when you say you were forming a	33
2 3	A I think so. The this is the address that Maryland has on file, so that's why the title went there.	2 3	Q And so when you say you were forming a company, was it a company to handle this one	33
2 3 4	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in	2 3 4	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland	33
2 3 4 5	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they	2 3 4 5	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company?	33
2 3 4 5 6	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in	2 3 4 5 6	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes.	33
2 3 4 5 6 7 8 9	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address.	2 3 4 5 6 7	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in	33
2 3 4 5 6 7 8 9	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at	2 3 4 5 6 7 8 9	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time?	33
2 3 4 5 6 7 8 9 10 11	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at that address?	2 3 4 5 6 7 8 9 10 11	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time? A The Montauk Avenue was going to be the	33
2 3 4 5 6 7 8 9 10 11 12	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at that address? A No.	2 3 4 5 6 7 8 9 10 11 12	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time? A The Montauk Avenue was going to be the address.	33
2 3 4 5 6 7 8 9 10 11 12 13	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at that address? A No. Q So I guess the next time you went to the	2 3 4 5 6 7 8 9 10 11 12 13	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time? A The Montauk Avenue was going to be the address. Q And is that in a is that in a	33
2 3 4 5 6 7 8 9 10 11 12 13 14	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at that address? A No. Q So I guess the next time you went to the office you picked it up in the mail?	2 3 4 5 6 7 8 9 10 11 12 13	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time? A The Montauk Avenue was going to be the address. Q And is that in a is that in a neighborhood type setting?	33
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at that address? A No. Q So I guess the next time you went to the office you picked it up in the mail? A No, they sent it to me.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time? A The Montauk Avenue was going to be the address. Q And is that in a is that in a neighborhood type setting? A Yes.	33
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at that address? A No. Q So I guess the next time you went to the office you picked it up in the mail? A No, they sent it to me. Q And, do you know, why was did you make	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time? A The Montauk Avenue was going to be the address. Q And is that in a is that in a neighborhood type setting? A Yes. Q Was there a mailbox at that property at	33
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at that address? A No. Q So I guess the next time you went to the office you picked it up in the mail? A No, they sent it to me. Q And, do you know, why was did you make the decision to register the car in Maryland?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time? A The Montauk Avenue was going to be the address. Q And is that in a is that in a neighborhood type setting? A Yes. Q Was there a mailbox at that property at that time?	33
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at that address? A No. Q So I guess the next time you went to the office you picked it up in the mail? A No, they sent it to me. Q And, do you know, why was did you make the decision to register the car in Maryland? A Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time? A The Montauk Avenue was going to be the address. Q And is that in a is that in a neighborhood type setting? A Yes. Q Was there a mailbox at that property at that time? A Yes, there's a mailbox there.	33
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at that address? A No. Q So I guess the next time you went to the office you picked it up in the mail? A No, they sent it to me. Q And, do you know, why was did you make the decision to register the car in Maryland? A Yes. Q And why is that?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time? A The Montauk Avenue was going to be the address. Q And is that in a is that in a neighborhood type setting? A Yes. Q Was there a mailbox at that property at that time? A Yes, there's a mailbox there. Q Do you receive mail there?	33
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at that address? A No. Q So I guess the next time you went to the office you picked it up in the mail? A No, they sent it to me. Q And, do you know, why was did you make the decision to register the car in Maryland? A Yes. Q And why is that? A Because we were forming a company in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time? A The Montauk Avenue was going to be the address. Q And is that in a is that in a neighborhood type setting? A Yes. Q Was there a mailbox at that property at that time? A Yes, there's a mailbox there. Q Do you receive mail there? A It gets forwarded.	33
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at that address? A No. Q So I guess the next time you went to the office you picked it up in the mail? A No, they sent it to me. Q And, do you know, why was did you make the decision to register the car in Maryland? A Yes. Q And why is that? A Because we were forming a company in Maryland. I am forming a company in Maryland.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time? A The Montauk Avenue was going to be the address. Q And is that in a is that in a neighborhood type setting? A Yes. Q Was there a mailbox at that property at that time? A Yes, there's a mailbox there. Q Do you receive mail there? A It gets forwarded. Q So mail sent to that address gets	33
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A I think so. The this is the address that Maryland has on file, so that's why the title went there. Q And do you know why that address was used rather than your home address? A Because I was registering the vehicle in Maryland at the Montauk Avenue address, but they didn't have that address on file so the title got sent to this address. Q And do you regularly check your mail at that address? A No. Q So I guess the next time you went to the office you picked it up in the mail? A No, they sent it to me. Q And, do you know, why was did you make the decision to register the car in Maryland? A Yes. Q And why is that? A Because we were forming a company in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q And so when you say you were forming a company, was it a company to handle this one residential property? A This is the first one. Q And that was going to be a Maryland company? A Uh-huh, yes. Q And did the company have an address in Maryland at that time? A The Montauk Avenue was going to be the address. Q And is that in a is that in a neighborhood type setting? A Yes. Q Was there a mailbox at that property at that time? A Yes, there's a mailbox there. Q Do you receive mail there? A It gets forwarded.	33

	iviariaavi, joan	_		
	34			36
1	A Yes.	1	Q Sorry. Yes. Did you discuss with him	
2	Q And up until April 2014, is it correct	2	the need to have a Maryland address if you were	
3	that no actual company had been formed with regards	3	going to register the car in Maryland?	
4	to the Montauk Avenue property?	4	A Well, the point was to use the car with	
5	A Not yet.	5	the new company and the company was a Maryland	
6	Q And so it still hasn't been formed; is	6	company, so the address being a Maryland address	
7	that correct?	7	was because the company was going to be a Maryland	
8	A It's in the process.	8	company. It really wasn't the other way around.	
9	Q So were you making were you paying for	9	Q Right. Well, you had to have a Maryland	
10	the work on Montauk Avenue from personal funds?	10	address to register the car in Maryland; is that	
11	MR. LEVINE: Objection, relevance.	11	correct?	
12	THE WITNESS: Yeah.	12	A Yes.	
13	BY MR. BRAGDON:	13	Q And is that why so that's why you used	
14	Q And so are you saying that the eventual	14	your client's address the work address at your	
15	plan was that the car would be owned by the company	15	client's office?	
16	or that you would use it for business purposes?	16	A This address?	
17	A Use it for business purposes.	17	Q Yes.	
18	Q Did you plan on transferring title of the	18	A No, that's just the address that Maryland	
19	car to the company?	19	had on file for me. That's why the title got sent	
20	A I hadn't thought the whole process	20	there. I didn't give Maryland that address.	
21	through yet. It was more of a I was still	21	That's just the address they had on file.	
22	speaking to the CPA who does my taxes to figure out	22	Q Do you know what address you did give	
	35			37
1		1	Maryland?	37
	what the best approach was.	1 2	Maryland? A The Montauk Avenue.	37
2	what the best approach was. Q So did you make the choice then to use	ı	A The Montauk Avenue.	37
	what the best approach was.	2	A The Montauk Avenue. Q Now, you didn't fill out the form for the	37
2 3	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW	2 3	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application?	37
2 3 4	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes.	2 3 4	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet.	37
2 3 4 5	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes.	2 3 4 5	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application?	37
2 3 4 5	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the	2 3 4 5 6	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title?	37
2 3 4 5	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned	2 3 4 5 6 7	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title?	37
2 3 4 5 6 7 8	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly	2 3 4 5 6 7 8	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that.	37
2 3 4 5 6 7 8 9	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly check mail on?	2 3 4 5 6 7 8 9	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that. Q So do you know what address was on that	37
2 3 4 5 6 7 8 9	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly check mail on? A No.	2 3 4 5 6 7 8 9	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that. Q So do you know what address was on that form?	37
2 3 4 5 6 7 8 9 10 11	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly check mail on? A No. Q Did anyone else did your husband	2 3 4 5 6 7 8 9 10 11	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that. Q So do you know what address was on that form? A I don't know.	37
2 3 4 5 6 7 8 9 10 11 12	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly check mail on? A No. Q Did anyone else did your husband participate in you making the decision to register	2 3 4 5 6 7 8 9 10 11 12	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that. Q So do you know what address was on that form? A I don't know. Q And do you know how Maryland would have	37
2 3 4 5 6 7 8 9 10 11 12 13	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly check mail on? A No. Q Did anyone else did your husband participate in you making the decision to register the car in Maryland?	2 3 4 5 6 7 8 9 10 11 12 13	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that. Q So do you know what address was on that form? A I don't know. Q And do you know how Maryland would have had that address on file already before the	37
2 3 4 5 6 7 8 9 10 11 12 13	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly check mail on? A No. Q Did anyone else did your husband participate in you making the decision to register the car in Maryland? A Yes.	2 3 4 5 6 7 8 9 10 11 12 13	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that. Q So do you know what address was on that form? A I don't know. Q And do you know how Maryland would have had that address on file already before the purchase of the BMW?	37
2 3 4 5 6 7 8 9 10 11 12 13 14 15	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly check mail on? A No. Q Did anyone else did your husband participate in you making the decision to register the car in Maryland? A Yes. Q And were there any how did you make	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that. Q So do you know what address was on that form? A I don't know. Q And do you know how Maryland would have had that address on file already before the purchase of the BMW? MR. LEVINE: Objection, calls for	37
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly check mail on? A No. Q Did anyone else did your husband participate in you making the decision to register the car in Maryland? A Yes. Q And were there any how did you make that decision with him?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that. Q So do you know what address was on that form? A I don't know. Q And do you know how Maryland would have had that address on file already before the purchase of the BMW? MR. LEVINE: Objection, calls for speculation.	37
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly check mail on? A No. Q Did anyone else did your husband participate in you making the decision to register the car in Maryland? A Yes. Q And were there any how did you make that decision with him? A Other than the fact that we were talking	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that. Q So do you know what address was on that form? A I don't know. Q And do you know how Maryland would have had that address on file already before the purchase of the BMW? MR. LEVINE: Objection, calls for speculation. THE WITNESS: I think we had I had a	37
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly check mail on? A No. Q Did anyone else did your husband participate in you making the decision to register the car in Maryland? A Yes. Q And were there any how did you make that decision with him? A Other than the fact that we were talking about the new company, that's it.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that. Q So do you know what address was on that form? A I don't know. Q And do you know how Maryland would have had that address on file already before the purchase of the BMW? MR. LEVINE: Objection, calls for speculation. THE WITNESS: I think we had I had a car there registered before.	37
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly check mail on? A No. Q Did anyone else did your husband participate in you making the decision to register the car in Maryland? A Yes. Q And were there any how did you make that decision with him? A Other than the fact that we were talking about the new company, that's it. Q And so at some point did you discuss the need to have if you were going to register the car in Maryland to have a Maryland address?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that. Q So do you know what address was on that form? A I don't know. Q And do you know how Maryland would have had that address on file already before the purchase of the BMW? MR. LEVINE: Objection, calls for speculation. THE WITNESS: I think we had I had a car there registered before. BY MR. BRAGDON: Q And do you was that the car, the one you referred to earlier that you had?	37
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	what the best approach was. Q So did you make the choice then to use this Maryland address as your address for the BMW Certificate of Title? A Yes. Q Were you concerned that by using the Maryland address that you were you concerned about using an address that you didn't regularly check mail on? A No. Q Did anyone else did your husband participate in you making the decision to register the car in Maryland? A Yes. Q And were there any how did you make that decision with him? A Other than the fact that we were talking about the new company, that's it. Q And so at some point did you discuss the need to have if you were going to register the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A The Montauk Avenue. Q Now, you didn't fill out the form for the title application? A Exactly, I had not done that yet. Q Did you eventually fill out a form for title? A I don't know if my husband did that. Q So do you know what address was on that form? A I don't know. Q And do you know how Maryland would have had that address on file already before the purchase of the BMW? MR. LEVINE: Objection, calls for speculation. THE WITNESS: I think we had I had a car there registered before. BY MR. BRAGDON: Q And do you was that the car, the one	37

		Г		
	38			40
1	Q The GLK, yes.	1	drive currently?	
2	A I think it was originally registered	2	A I actually carpool with someone from	
3	there. It is registered in Virginia now.	3	work.	
4	Q Do you still have that vehicle?	4	Q Is that someone who lives close to you?	
5	A Yes.	5	A Yes.	
6	Q Is that the vehicle you're currently	6	Q Do you alternate driving or do they drive	
7	driving?	7	every day?	
8	A I have it, yes.	8	A She drives most of the time.	
9	Q So if you can flip to Page 15 of your	9	Q When you drive, what vehicle do you use?	
10	production. The address on this is an insurance	10	A It depends. The GLK.	
11	policy document; is that correct?	11	Q And what other so the GLK, what make	
12	A Yes.	12	is that?	
13	Q Is that a document that you had or that	13	A Mercedes.	
14	you got from your husband?	14	Q And what year is the GLK, if you know,	
15	A This I had.	15	the year of the model?	
16	Q And so you the Montauk Avenue, you	16	A It's 2011.	
17	also chose to have the car insured at that address	17	Q Are there other vehicles that you use	
18	as well?	18	since the repossession of the BMW?	
19	A Yes, that's the same address.	19	A I have my sister's car.	
20	Q When the construction was completed at	20	Q Do you sometimes use your sister's car	
21	Montauk Avenue, was it your intent to sell that as	21	for the carpool or for errands?	
22	a residential property?	22	A Yes.	
	39			41
1			O Are there any other vehicles that you	41
1 2	A It's not complete.	1 2	Q Are there any other vehicles that you use?	41
2	A It's not complete.Q I guess my question is, is it planned	1 2 3	Q Are there any other vehicles that you use? A No.	41
	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will	2	use? A No.	41
2 3 4	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential	2 3	use? A No. Q And what's the make of your sister's car?	41
2 3	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will	2 3 4	use? A No. Q And what's the make of your sister's car? A A Porsche.	41
2 3 4 5	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser?	2 3 4 5	use? A No. Q And what's the make of your sister's car?	41
2 3 4 5 6	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell.	2 3 4 5 6	use? A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a	41
2 3 4 5 6 7	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on	2 3 4 5 6 7	use? A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed?	41
2 3 4 5 6 7 8	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed?	2 3 4 5 6 7 8	use? A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No.	41
2 3 4 5 6 7 8 9	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed? A At this point in time, no.	2 3 4 5 6 7 8 9	use? A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No. Q And is it fair to say that because it's	41
2 3 4 5 6 7 8 9	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed? A At this point in time, no. Q Can you turn to Page 19? This is the	2 3 4 5 6 7 8 9 10	use? A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No. Q And is it fair to say that because it's your sister that it's an informal arrangement where	41
2 3 4 5 6 7 8 9 10 11	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed? A At this point in time, no. Q Can you turn to Page 19? This is the Purchase Agreement that you signed for the BMW; is	2 3 4 5 6 7 8 9 10 11	use? A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No. Q And is it fair to say that because it's your sister that it's an informal arrangement where she has allowed you to borrow it?	41
2 3 4 5 6 7 8 9 10 11 12	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed? A At this point in time, no. Q Can you turn to Page 19? This is the Purchase Agreement that you signed for the BMW; is that correct?	2 3 4 5 6 7 8 9 10 11 12	use? A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No. Q And is it fair to say that because it's your sister that it's an informal arrangement where she has allowed you to borrow it? A Yes.	41
2 3 4 5 6 7 8 9 10 11 12 13	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed? A At this point in time, no. Q Can you turn to Page 19? This is the Purchase Agreement that you signed for the BMW; is that correct? A Yes.	2 3 4 5 6 7 8 9 10 11 12 13	use? A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No. Q And is it fair to say that because it's your sister that it's an informal arrangement where she has allowed you to borrow it? A Yes. Q Can you turn to Mahdavi 22, please? And	41
2 3 4 5 6 7 8 9 10 11 12 13	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed? A At this point in time, no. Q Can you turn to Page 19? This is the Purchase Agreement that you signed for the BMW; is that correct? A Yes. Q At the time you signed this agreement,	2 3 4 5 6 7 8 9 10 11 12 13 14	use? A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No. Q And is it fair to say that because it's your sister that it's an informal arrangement where she has allowed you to borrow it? A Yes. Q Can you turn to Mahdavi 22, please? And can you confirm when you get there that this is the	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed? A At this point in time, no. Q Can you turn to Page 19? This is the Purchase Agreement that you signed for the BMW; is that correct? A Yes. Q At the time you signed this agreement, you understood there was an unpaid balance of	2 3 4 5 6 7 8 9 10 11 12 13 14	A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No. Q And is it fair to say that because it's your sister that it's an informal arrangement where she has allowed you to borrow it? A Yes. Q Can you turn to Mahdavi 22, please? And can you confirm when you get there that this is the account statement for the account you paid the	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed? A At this point in time, no. Q Can you turn to Page 19? This is the Purchase Agreement that you signed for the BMW; is that correct? A Yes. Q At the time you signed this agreement, you understood there was an unpaid balance of \$64,000; is that correct?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No. Q And is it fair to say that because it's your sister that it's an informal arrangement where she has allowed you to borrow it? A Yes. Q Can you turn to Mahdavi 22, please? And can you confirm when you get there that this is the account statement for the account you paid the deposit for the BMW? A Yes. Q Do you recall can you estimate what	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed? A At this point in time, no. Q Can you turn to Page 19? This is the Purchase Agreement that you signed for the BMW; is that correct? A Yes. Q At the time you signed this agreement, you understood there was an unpaid balance of \$64,000; is that correct? A Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No. Q And is it fair to say that because it's your sister that it's an informal arrangement where she has allowed you to borrow it? A Yes. Q Can you turn to Mahdavi 22, please? And can you confirm when you get there that this is the account statement for the account you paid the deposit for the BMW? A Yes.	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed? A At this point in time, no. Q Can you turn to Page 19? This is the Purchase Agreement that you signed for the BMW; is that correct? A Yes. Q At the time you signed this agreement, you understood there was an unpaid balance of \$64,000; is that correct? A Yes. Q And was it your understanding that you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No. Q And is it fair to say that because it's your sister that it's an informal arrangement where she has allowed you to borrow it? A Yes. Q Can you turn to Mahdavi 22, please? And can you confirm when you get there that this is the account statement for the account you paid the deposit for the BMW? A Yes. Q Do you recall can you estimate what	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed? A At this point in time, no. Q Can you turn to Page 19? This is the Purchase Agreement that you signed for the BMW; is that correct? A Yes. Q At the time you signed this agreement, you understood there was an unpaid balance of \$64,000; is that correct? A Yes. Q And was it your understanding that you would have obtained that amount through financing through some sort of lender? A Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	use? A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No. Q And is it fair to say that because it's your sister that it's an informal arrangement where she has allowed you to borrow it? A Yes. Q Can you turn to Mahdavi 22, please? And can you confirm when you get there that this is the account statement for the account you paid the deposit for the BMW? A Yes. Q Do you recall can you estimate what the balance was on the account at the end of 2013? A Probably roughly 25,000, I would assume. Q Is it fair to say in this account over	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A It's not complete. Q I guess my question is, is it planned that that will be some sort of office or that will be a construction project you sell to a residential purchaser? A Sell. Q Is it fair to say that you didn't plan on living at Montauk Avenue after it was completed? A At this point in time, no. Q Can you turn to Page 19? This is the Purchase Agreement that you signed for the BMW; is that correct? A Yes. Q At the time you signed this agreement, you understood there was an unpaid balance of \$64,000; is that correct? A Yes. Q And was it your understanding that you would have obtained that amount through financing through some sort of lender?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	use? A No. Q And what's the make of your sister's car? A A Porsche. Q Have you ever have you rented a vehicle since your BMW was repossessed? A No. Q And is it fair to say that because it's your sister that it's an informal arrangement where she has allowed you to borrow it? A Yes. Q Can you turn to Mahdavi 22, please? And can you confirm when you get there that this is the account statement for the account you paid the deposit for the BMW? A Yes. Q Do you recall can you estimate what the balance was on the account at the end of 2013? A Probably roughly 25,000, I would assume.	41

_				
	42			44
1	that had built up in a very that the variations	1	A No, they didn't they didn't pay off	
2	were slight as you took money out and put money in	2	the GLK, so my husband brought the car back home.	
3	or was it an account that there were large changes	3	Q Okay. So Beltway didn't pay off the GLK?	
4	or variations in it?	4	A Right.	
5	A No, it pretty much stayed the same.	5	Q And when did you learn that Beltway	
6	Q Were there any so there is it fair	6	hadn't done that?	
7	to say there wouldn't have been any large transfer	7	A It was it was later. It was sometime	
8	into the account in early 2014 before purchase of	8	later in May.	
9	the vehicle?	9	Q And do you recall what your husband told	
10	A 2014? I'd have to go back and look.	10	you about that?	
11	Q Were there any other conversations you	11	A He just brought I he brought the	
12	had that we haven't already discussed before	12	car back home.	
13	purchase of the vehicle about the BMW with your	13	MR. BRAGDON: Give me one minute. I'm	
14	husband that you can recall?	14	flipping through these documents. Do you want to	
15	A No.	15	take a short break?	
16	Q Is it fair to say that you didn't get	16	MR. LEVINE: Do you want to take a break?	
17	into the details of how the purchase was going to	17	THE WITNESS: It doesn't matter.	
18	happen?	18	MR. BRAGDON: Do you mind if I do?	
19	A No.	19	MR. LEVINE: No, go right ahead.	
20	Q Is that not fair to say? I'm sorry. I	20	(Brief pause.)	
21	asked the question in probably a bad way. Did you	21	BY MR. BRAGDON:	
22	get into the details before the purchase with your	22	Q Ms. Mahdavi, I want to talk a little bit	
	43			45
1	husband?	1	about the night of the repossession of the BMW.	45
1 2	husband?	1 2	about the night of the repossession of the BMW. A Uh-huh.	45
2	husband? A No, not at all.	1 2 3	A Uh-huh.	45
	husband? A No, not at all.	ı		45
2 3	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been	3	A Uh-huh. Q Was it a Monday night?	45
2 3 4	husband? A No, not at all. Q Has the amount the outstanding amount	3 4	A Uh-huh.Q Was it a Monday night?A Yes.Q Who was at home?	45
2 3 4 5	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off?	3 4 5	A Uh-huh.Q Was it a Monday night?A Yes.	45
2 3 4 5 6 7	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount?	3 4 5 6 7	A Uh-huh.Q Was it a Monday night?A Yes.Q Who was at home?A I was at home with my kids.Q Was your husband at home?	45
2 3 4 5 6	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No.	3 4 5 6	A Uh-huh.Q Was it a Monday night?A Yes.Q Who was at home?A I was at home with my kids.	45
2 3 4 5 6 7 8	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes.	3 4 5 6 7 8	 A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. 	45
2 3 4 5 6 7 8 9	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes. Q Did you receive a trade-in credit for	3 4 5 6 7 8 9	 A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. Q Do you know where he was? 	45
2 3 4 5 6 7 8 9	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes. Q Did you receive a trade-in credit for purchase of the BMW?	3 4 5 6 7 8 9 10	 A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. Q Do you know where he was? A I don't know. 	45
2 3 4 5 6 7 8 9 10 11	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes. Q Did you receive a trade-in credit for purchase of the BMW? A I was supposed to on the agreement. So	3 4 5 6 7 8 9 10 11	 A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. Q Do you know where he was? A I don't know. Q And I know you described this in your 	45
2 3 4 5 6 7 8 9 10 11 12	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes. Q Did you receive a trade-in credit for purchase of the BMW? A I was supposed to on the agreement. So technically I've paid how do you say it? Yes, I	3 4 5 6 7 8 9 10 11 12	A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. Q Do you know where he was? A I don't know. Q And I know you described this in your interrogatories, but can you describe briefly what	45
2 3 4 5 6 7 8 9 10 11 12 13	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes. Q Did you receive a trade-in credit for purchase of the BMW? A I was supposed to on the agreement. So technically I've paid how do you say it? Yes, I was supposed to get a trade-in allowance on the	3 4 5 6 7 8 9 10 11 12 13	A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. Q Do you know where he was? A I don't know. Q And I know you described this in your interrogatories, but can you describe briefly what happened or what you observed that night?	45
2 3 4 5 6 7 8 9 10 11 12 13 14	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes. Q Did you receive a trade-in credit for purchase of the BMW? A I was supposed to on the agreement. So technically I've paid how do you say it? Yes, I was supposed to get a trade-in allowance on the deal, but I didn't get it. We took the car back.	3 4 5 6 7 8 9 10 11 12 13 14	A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. Q Do you know where he was? A I don't know. Q And I know you described this in your interrogatories, but can you describe briefly what happened or what you observed that night? A It was the middle of the night. The	45
2 3 4 5 6 7 8 9 10 11 12 13 14 15	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes. Q Did you receive a trade-in credit for purchase of the BMW? A I was supposed to on the agreement. So technically I've paid how do you say it? Yes, I was supposed to get a trade-in allowance on the deal, but I didn't get it. We took the car back. Q The GLK?	3 4 5 6 7 8 9 10 11 12 13 14 15	A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. Q Do you know where he was? A I don't know. Q And I know you described this in your interrogatories, but can you describe briefly what happened or what you observed that night? A It was the middle of the night. The doorbell rang. The guy said, Give me the keys to	45
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes. Q Did you receive a trade-in credit for purchase of the BMW? A I was supposed to on the agreement. So technically I've paid how do you say it? Yes, I was supposed to get a trade-in allowance on the deal, but I didn't get it. We took the car back. Q The GLK? A Right. Q So was the amount so the original plan	3 4 5 6 7 8 9 10 11 12 13 14 15	A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. Q Do you know where he was? A I don't know. Q And I know you described this in your interrogatories, but can you describe briefly what happened or what you observed that night? A It was the middle of the night. The doorbell rang. The guy said, Give me the keys to the white BMW. I went outside. There were two	45
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes. Q Did you receive a trade-in credit for purchase of the BMW? A I was supposed to on the agreement. So technically I've paid how do you say it? Yes, I was supposed to get a trade-in allowance on the deal, but I didn't get it. We took the car back. Q The GLK? A Right.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. Q Do you know where he was? A I don't know. Q And I know you described this in your interrogatories, but can you describe briefly what happened or what you observed that night? A It was the middle of the night. The doorbell rang. The guy said, Give me the keys to the white BMW. I went outside. There were two guys. He said he was there for Dave. I don't know	45
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes. Q Did you receive a trade-in credit for purchase of the BMW? A I was supposed to on the agreement. So technically I've paid how do you say it? Yes, I was supposed to get a trade-in allowance on the deal, but I didn't get it. We took the car back. Q The GLK? A Right. Q So was the amount so the original plan was that you would get a trade-in credit and trade	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. Q Do you know where he was? A I don't know. Q And I know you described this in your interrogatories, but can you describe briefly what happened or what you observed that night? A It was the middle of the night. The doorbell rang. The guy said, Give me the keys to the white BMW. I went outside. There were two guys. He said he was there for Dave. I don't know who Dave is. He said, Give me the keys to the BMW. I called my husband. He said, No, don't give him	45
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes. Q Did you receive a trade-in credit for purchase of the BMW? A I was supposed to on the agreement. So technically I've paid how do you say it? Yes, I was supposed to get a trade-in allowance on the deal, but I didn't get it. We took the car back. Q The GLK? A Right. Q So was the amount so the original plan was that you would get a trade-in credit and trade the car in?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. Q Do you know where he was? A I don't know. Q And I know you described this in your interrogatories, but can you describe briefly what happened or what you observed that night? A It was the middle of the night. The doorbell rang. The guy said, Give me the keys to the white BMW. I went outside. There were two guys. He said he was there for Dave. I don't know who Dave is. He said, Give me the keys to the BMW.	45
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	husband? A No, not at all. Q Has the amount the outstanding amount on the loan for the GLK with PenFed, has that been paid off? A No. Q Are you still paying that amount? A Yes. Q Did you receive a trade-in credit for purchase of the BMW? A I was supposed to on the agreement. So technically I've paid how do you say it? Yes, I was supposed to get a trade-in allowance on the deal, but I didn't get it. We took the car back. Q The GLK? A Right. Q So was the amount so the original plan was that you would get a trade-in credit and trade the car in? A Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Uh-huh. Q Was it a Monday night? A Yes. Q Who was at home? A I was at home with my kids. Q Was your husband at home? A No. Q Do you know where he was? A I don't know. Q And I know you described this in your interrogatories, but can you describe briefly what happened or what you observed that night? A It was the middle of the night. The doorbell rang. The guy said, Give me the keys to the white BMW. I went outside. There were two guys. He said he was there for Dave. I don't know who Dave is. He said, Give me the keys to the BMW. I called my husband. He said, No, don't give him the keys. He goes, That's your car. He's like,	45

	46			48
1 2 3 4 5 6 7 8 9 10 11 12 13	tow truck. When I went to call the police, the guy left. I told him to leave, and then when I called the police when I told him I was calling the police, they left. Q And he left with the vehicle? A Uh-huh, yes. He didn't tell me his name. He didn't give me a business card. He didn't he didn't say anything. All he said was, I'm there for Dave. Q And when you talked to your husband that night, did he say anything else about why the car might be being repossessed? A No, the only thing he said is, No. He	1 2 3 4 5 6 7 8 9 10 11 12 13	issues at BW involving duplicate titles being obtained? A No. Q Are there any conversations you've had with your husband after repossession of the vehicle about BW Auto that you can recall? A About BW? Q Auto. A Only regarding my case. Q Has he told you anything about the Maryland litigation? A No. Q And what has he told you about this case?	
14	said, That's your car. He said, Tell him to leave,	14	A Just that told me about this case?	
15	that you're calling the police.	15	mean, we've talked about, I mean, I bought a car,	
16	Q Had your husband up to that point told	16	you guys took my car, it's been six months, I want	
17	you anything about any issues at BW Auto?	17	my car back.	
18	A No.	18	Q Can we talk a little bit about the	
19	Q And after that did your husband tell you	19	property that you have alleged was in the car at	
20	anything more about what was going on at BW Auto?	20	the time it was repossessed? Is it your contention	
21 22	A The only thing he told me was that the car was taken because of BW.	21 22	there was a Cartier watch in the car? A Yes.	
22	car was taken because of Bw.	22	A Tes.	
	47			49
1	Q Did he give you any details about what	1	Q When did you get the watch?	
2	was going on at BW with you?	2	A It was my husband's watch.	
3	A No.	3	Q Was it a watch that you wore?	
4	Q Has he ever said anything to you about	4	A Yes.	
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	Mr. Molavi or Ms. Nozary about what about any	5		
		Ι.	Q Can you describe it generally?	
	actions they have taken at BW Auto? A No	6	A It was a Cartier Pasha with diamonds	
7 8	A No.	6 7	A It was a Cartier Pasha with diamonds around the bezel.	
7		Ι.	A It was a Cartier Pasha with diamonds	
7 8	A No.Q Did your husband come home after that	6 7 8	A It was a Cartier Pasha with diamonds around the bezel. Q And	
7 8 9 10 11	 A No. Q Did your husband come home after that incident? A After I called him? Q Yeah, that night. 	6 7 8 9 10 11	A It was a Cartier Pasha with diamonds around the bezel. Q And MR. MARKELS: Around the what? THE WITNESS: Around the bezel, around the edge.	
7 8 9 10 11 12	A No. Q Did your husband come home after that incident? A After I called him? Q Yeah, that night. A Yes.	6 7 8 9 10 11 12	A It was a Cartier Pasha with diamonds around the bezel. Q And MR. MARKELS: Around the what? THE WITNESS: Around the bezel, around the edge. MR. MARKELS: I didn't know there was a	
7 8 9 10 11 12 13	 A No. Q Did your husband come home after that incident? A After I called him? Q Yeah, that night. A Yes. Q He got there after did he get there 	6 7 8 9 10 11 12 13	A It was a Cartier Pasha with diamonds around the bezel. Q And MR. MARKELS: Around the what? THE WITNESS: Around the bezel, around the edge. MR. MARKELS: I didn't know there was a technical term for that.	
7 8 9 10 11 12 13 14	A No. Q Did your husband come home after that incident? A After I called him? Q Yeah, that night. A Yes. Q He got there after did he get there after the repossession, P.A.R. had left?	6 7 8 9 10 11 12 13 14	A It was a Cartier Pasha with diamonds around the bezel. Q And MR. MARKELS: Around the what? THE WITNESS: Around the bezel, around the edge. MR. MARKELS: I didn't know there was a technical term for that. BY MR. BRAGDON:	
7 8 9 10 11 12 13 14 15	A No. Q Did your husband come home after that incident? A After I called him? Q Yeah, that night. A Yes. Q He got there after did he get there after the repossession, P.A.R. had left? A Yes.	6 7 8 9 10 11 12 13 14 15	A It was a Cartier Pasha with diamonds around the bezel. Q And MR. MARKELS: Around the what? THE WITNESS: Around the bezel, around the edge. MR. MARKELS: I didn't know there was a technical term for that. BY MR. BRAGDON: Q And do you know when your husband got	
7 8 9 10 11 12 13 14	A No. Q Did your husband come home after that incident? A After I called him? Q Yeah, that night. A Yes. Q He got there after did he get there after the repossession, P.A.R. had left?	6 7 8 9 10 11 12 13 14	A It was a Cartier Pasha with diamonds around the bezel. Q And MR. MARKELS: Around the what? THE WITNESS: Around the bezel, around the edge. MR. MARKELS: I didn't know there was a technical term for that. BY MR. BRAGDON:	
7 8 9 10 11 12 13 14 15 16	A No. Q Did your husband come home after that incident? A After I called him? Q Yeah, that night. A Yes. Q He got there after did he get there after the repossession, P.A.R. had left? A Yes. Q Did your husband continue reporting to	6 7 8 9 10 11 12 13 14 15 16	A It was a Cartier Pasha with diamonds around the bezel. Q And MR. MARKELS: Around the what? THE WITNESS: Around the bezel, around the edge. MR. MARKELS: I didn't know there was a technical term for that. BY MR. BRAGDON: Q And do you know when your husband got that watch?	
7 8 9 10 11 12 13 14 15 16 17	A No. Q Did your husband come home after that incident? A After I called him? Q Yeah, that night. A Yes. Q He got there after did he get there after the repossession, P.A.R. had left? A Yes. Q Did your husband continue reporting to work after that.	6 7 8 9 10 11 12 13 14 15 16 17	A It was a Cartier Pasha with diamonds around the bezel. Q And MR. MARKELS: Around the what? THE WITNESS: Around the bezel, around the edge. MR. MARKELS: I didn't know there was a technical term for that. BY MR. BRAGDON: Q And do you know when your husband got that watch? A I don't know.	
7 8 9 10 11 12 13 14 15 16 17 18	A No. Q Did your husband come home after that incident? A After I called him? Q Yeah, that night. A Yes. Q He got there after did he get there after the repossession, P.A.R. had left? A Yes. Q Did your husband continue reporting to work after that. A I don't know. Q Do you know the last time your husband went to BW Auto to work?	6 7 8 9 10 11 12 13 14 15 16 17	A It was a Cartier Pasha with diamonds around the bezel. Q And MR. MARKELS: Around the what? THE WITNESS: Around the bezel, around the edge. MR. MARKELS: I didn't know there was a technical term for that. BY MR. BRAGDON: Q And do you know when your husband got that watch? A I don't know. Q And when did you start wearing it? A I've been wearing it the last ten years on and off.	
7 8 9 10 11 12 13 14 15 16 17 18	A No. Q Did your husband come home after that incident? A After I called him? Q Yeah, that night. A Yes. Q He got there after did he get there after the repossession, P.A.R. had left? A Yes. Q Did your husband continue reporting to work after that. A I don't know. Q Do you know the last time your husband	6 7 8 9 10 11 12 13 14 15 16 17 18	A It was a Cartier Pasha with diamonds around the bezel. Q And MR. MARKELS: Around the what? THE WITNESS: Around the bezel, around the edge. MR. MARKELS: I didn't know there was a technical term for that. BY MR. BRAGDON: Q And do you know when your husband got that watch? A I don't know. Q And when did you start wearing it? A I've been wearing it the last ten years	

	Wiaridavi, joa	Г		
	50			52
1	Q Was it ever appraised?	1	regular practice to leave it in the car, though?	
2	A Yes.	2	A I mean, I'm sure I've left it in my car	
3	Q Was that for insurance purposes?	3	before, yes. Is it my regular practice? I	
4	A Yes.	4	couldn't say that that's my regular practice.	
5	Q Do you have a copy of that appraisal?	5	Q You also say you left a gym bag in the	
6	A The appraisal, no. The insurance doesn't	6	car, in the BMW?	
7	have it anymore.	7	A Uh-huh.	
8	Q Do you have a copy of an insurance	8	Q Would that have had your gym clothes in	
9	statement where the appraisal is listed?	9	it?	
10	A Yes.	10	A It just had an extra set of gym clothes.	
11	Q Did you wear it every day?	11	Q So you didn't is it that since there's	
12	A No.	12	no locker room, did you change after the workout or	
13	Q How often did you wear it?	13	did you just have	
14	A Maybe once every couple weeks.	14	A I just always kept an extra gym bag in	
15	Q And where did you keep it in between	15	the car.	
16	wearing it?	16	Q And what were the what was in that gym	
17	A In my closet.	17	bag?	
18	Q Were you wearing it the Monday that the	18	A I just always kept a pair of tennis	
19	BMW was repossessed?	19	shoes, pants, sports bra, shirt, and a sweatshirt.	
20	A Yes.	20	Q And you also said there was rent money in	
21	Q Did you wear it to work that day?	21	the car?	
22	A Yes.	22	A Yes.	
	51			53
		1		53
1	Q And you said that you went to the gym	1	Q And that was cash?	53
2	Q And you said that you went to the gym after work?	2	A Yes.	53
2 3	Q And you said that you went to the gym after work? A Yes.	2 3	A Yes. Q Were there any checks?	53
2 3 4	 Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while 	2 3 4	A Yes.Q Were there any checks?A No.	53
2 3 4 5	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym?	2 3 4 5	A Yes.Q Were there any checks?A No.Q Do you know who paid that rent money that	53
2 3 4 5 6	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes.	2 3 4 5 6	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car?	53
2 3 4 5 6 7	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after	2 3 4 5 6 7	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can get	53
2 3 4 5 6 7 8	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym?	2 3 4 5 6 7 8	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names?	53
2 3 4 5 6 7 8 9	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No.	2 3 4 5 6 7 8 9	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have	53
2 3 4 5 6 7 8 9	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car?	2 3 4 5 6 7 8 9 10	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash?	53
2 3 4 5 6 7 8 9 10 11	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car? A In the center console.	2 3 4 5 6 7 8 9 10 11	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash? A Yes.	53
2 3 4 5 6 7 8 9 10 11 12	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car? A In the center console. Q Do you know why you left the watch or you	2 3 4 5 6 7 8 9 10 11 12	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash? A Yes. Q And others that pay by check?	53
2 3 4 5 6 7 8 9 10 11 12 13	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car? A In the center console. Q Do you know why you left the watch or you have alleged you left the watch in the car	2 3 4 5 6 7 8 9 10 11 12 13	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash? A Yes. Q And others that pay by check? A Yes.	53
2 3 4 5 6 7 8 9 10 11 12 13 14	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car? A In the center console. Q Do you know why you left the watch or you have alleged you left the watch in the car overnight?	2 3 4 5 6 7 8 9 10 11 12 13	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash? A Yes. Q And others that pay by check? A Yes. Q And so the tenants who pay by cash, do	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car? A In the center console. Q Do you know why you left the watch or you have alleged you left the watch in the car overnight? A Why I left it in that night? I just I	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash? A Yes. Q And others that pay by check? A Yes. Q And so the tenants who pay by cash, do you collect it from them personally?	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car? A In the center console. Q Do you know why you left the watch or you have alleged you left the watch in the car overnight? A Why I left it in that night? I just I took it off because I go to the gym. I take	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash? A Yes. Q And others that pay by check? A Yes. Q And so the tenants who pay by cash, do you collect it from them personally? A The property manager that I have in	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car? A In the center console. Q Do you know why you left the watch or you have alleged you left the watch in the car overnight? A Why I left it in that night? I just I took it off because I go to the gym. I take boxing. The gym I go to doesn't have a locker	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash? A Yes. Q And others that pay by check? A Yes. Q And so the tenants who pay by cash, do you collect it from them personally? A The property manager that I have in Winchester collects the cash.	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car? A In the center console. Q Do you know why you left the watch or you have alleged you left the watch in the car overnight? A Why I left it in that night? I just I took it off because I go to the gym. I take boxing. The gym I go to doesn't have a locker room, so I left it in the car. When I got home, I	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash? A Yes. Q And others that pay by check? A Yes. Q And so the tenants who pay by cash, do you collect it from them personally? A The property manager that I have in Winchester collects the cash. Q And how much rent money was in the car	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car? A In the center console. Q Do you know why you left the watch or you have alleged you left the watch in the car overnight? A Why I left it in that night? I just I took it off because I go to doesn't have a locker room, so I left it in the car. Uhen I got home, I must have left it in the car. I didn't think about	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash? A Yes. Q And others that pay by check? A Yes. Q And so the tenants who pay by cash, do you collect it from them personally? A The property manager that I have in Winchester collects the cash. Q And how much rent money was in the car when it was repossessed?	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car? A In the center console. Q Do you know why you left the watch or you have alleged you left the watch in the car overnight? A Why I left it in that night? I just I took it off because I go to the gym. I take boxing. The gym I go to doesn't have a locker room, so I left it in the car. When I got home, I must have left it in the car. I didn't think about grabbing it. I didn't think my car was going to be	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash? A Yes. Q And others that pay by check? A Yes. Q And so the tenants who pay by cash, do you collect it from them personally? A The property manager that I have in Winchester collects the cash. Q And how much rent money was in the car when it was repossessed? A I think it was 2,375.	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car? A In the center console. Q Do you know why you left the watch or you have alleged you left the watch in the car overnight? A Why I left it in that night? I just I took it off because I go to the gym. I take boxing. The gym I go to doesn't have a locker room, so I left it in the car. When I got home, I must have left it in the car. I didn't think about grabbing it. I didn't think my car was going to be taken from my driveway.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash? A Yes. Q And others that pay by check? A Yes. Q And so the tenants who pay by cash, do you collect it from them personally? A The property manager that I have in Winchester collects the cash. Q And how much rent money was in the car when it was repossessed? A I think it was 2,375. Q And was that one month's rent from	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q And you said that you went to the gym after work? A Yes. Q And you kept the watch in the car while you were in the gym? A Yes. Q Did you put the watch back on after leaving the gym? A No. Q And where did you keep it in the car? A In the center console. Q Do you know why you left the watch or you have alleged you left the watch in the car overnight? A Why I left it in that night? I just I took it off because I go to the gym. I take boxing. The gym I go to doesn't have a locker room, so I left it in the car. When I got home, I must have left it in the car. I didn't think about grabbing it. I didn't think my car was going to be	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Yes. Q Were there any checks? A No. Q Do you know who paid that rent money that was in the car? A The tenants that pay cash. I can getyou mean, you want the tenant's names? Q Are there certain tenants that you have that pay cash? A Yes. Q And others that pay by check? A Yes. Q And so the tenants who pay by cash, do you collect it from them personally? A The property manager that I have in Winchester collects the cash. Q And how much rent money was in the car when it was repossessed? A I think it was 2,375.	53

	Trianavi, joa	
	54	56
1	A Yes.	1 A Common, no.
2	Q Do you know, which tenants were they?	2 Q What vehicle did you drive here today?
3	You can just say their last name.	3 A The Porsche.
4	A I'd have to go back and look and see	4 Q I guess, what other damages have you
5	which ones they are.	5 incurred as a result of the repossession? I
6	Q Is that rent for three properties or two	6 think let me take that back.
7	properties?	7 Was there any other property that I
8	A I think it was two.	8 haven't mentioned that was in the car?
9	Q And when did you pick up that cash?	9 A The car seat.
10	A It was the weekend before.	10 Q So, actually, there was the car seat that
11	Q And what was your usual practice for	11 you mentioned, phone chargers. Was there anything
12	handling cash rent payments?	12 else other than that?
13	A She collects it, and then when I see her,	
	she gives it to me and then I take it to the bank.	
14	e	14 Q So what other damages are you alleging 15 that the repossession caused you, monetary damages?
	Q And what bank do you go to? A SunTrust.	16 A Monetary damages? The fact that I'm
16		· · ·
17	Q And do you know when that weekend before	17 paying for another car. I'm paying for a car that
18	the repossession you met with the property manager?	18 I don't have. I'm paying legal fees. I'm taking 19 time off work.
19 20	A That Sunday. O And what's her name?	
20		` ' ' '
1		21 to make payments on the car?
22	Q And where did you meet with her?	22 A I have made payments. I have had some
	55	57
1	A At her house.	
1 2	A At her house.	1 payments deferred. I'm paying car insurance.
	A At her house. Q Is that in Virginia?	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on
2	A At her house.Q Is that in Virginia?A Winchester, Virginia.	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on
2 3	A At her house.Q Is that in Virginia?A Winchester, Virginia.	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of?
2 3 4	 A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd 	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped.
2 3 4 5	 A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of 	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that?
2 3 4 5 6	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month?	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance.
2 3 4 5 6 7	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a
2 3 4 5 6 7 8	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th.	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them?
2 3 4 5 6 7 8 9	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th. Q Would you normally keep the rent money in	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them? 9 A No.
2 3 4 5 6 7 8 9	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th. Q Would you normally keep the rent money in the car, in your car?	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them? 9 A No. 10 Q And just to be clear, you're not paying
2 3 4 5 6 7 8 9 10 11	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th. Q Would you normally keep the rent money in the car, in your car? A Normally? I don't know if I'd say	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them? 9 A No. 10 Q And just to be clear, you're not paying 11 your sister to use her car?
2 3 4 5 6 7 8 9 10 11 12	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th. Q Would you normally keep the rent money in the car, in your car? A Normally? I don't know if I'd say normally. She gave it to me. I had it in the car.	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them? 9 A No. 10 Q And just to be clear, you're not paying 11 your sister to use her car? 12 A No.
2 3 4 5 6 7 8 9 10 11 12 13	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th. Q Would you normally keep the rent money in the car, in your car? A Normally? I don't know if I'd say normally. She gave it to me. I had it in the car. Q Well, let me ask you this, do you have a	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them? 9 A No. 10 Q And just to be clear, you're not paying 11 your sister to use her car? 12 A No. 13 Q And is she paying for any other car or
2 3 4 5 6 7 8 9 10 11 12 13 14	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th. Q Would you normally keep the rent money in the car, in your car? A Normally? I don't know if I'd say normally. She gave it to me. I had it in the car. Q Well, let me ask you this, do you have a safe in your home?	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them? 9 A No. 10 Q And just to be clear, you're not paying 11 your sister to use her car? 12 A No. 13 Q And is she paying for any other car or 14 does she have another car she can use?
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th. Q Would you normally keep the rent money in the car, in your car? A Normally? I don't know if I'd say normally. She gave it to me. I had it in the car. Q Well, let me ask you this, do you have a safe in your home? A Yes, but I don't put rent money in my	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them? 9 A No. 10 Q And just to be clear, you're not paying 11 your sister to use her car? 12 A No. 13 Q And is she paying for any other car or 14 does she have another car she can use? 15 A She has another car.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th. Q Would you normally keep the rent money in the car, in your car? A Normally? I don't know if I'd say normally. She gave it to me. I had it in the car. Q Well, let me ask you this, do you have a safe in your home? A Yes, but I don't put rent money in my safe at home.	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them? 9 A No. 10 Q And just to be clear, you're not paying 11 your sister to use her car? 12 A No. 13 Q And is she paying for any other car or 14 does she have another car she can use? 15 A She has another car. 16 Q And do you know how many car payments
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th. Q Would you normally keep the rent money in the car, in your car? A Normally? I don't know if I'd say normally. She gave it to me. I had it in the car. Q Well, let me ask you this, do you have a safe in your home? A Yes, but I don't put rent money in my safe at home. Q Do you keep jewelry in the safe or	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them? 9 A No. 10 Q And just to be clear, you're not paying 11 your sister to use her car? 12 A No. 13 Q And is she paying for any other car or 14 does she have another car she can use? 15 A She has another car. 16 Q And do you know how many car payments 17 have been deferred?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th. Q Would you normally keep the rent money in the car, in your car? A Normally? I don't know if I'd say normally. She gave it to me. I had it in the car. Q Well, let me ask you this, do you have a safe in your home? A Yes, but I don't put rent money in my safe at home. Q Do you keep jewelry in the safe or valuable documents or what do you keep in the safe?	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them? 9 A No. 10 Q And just to be clear, you're not paying 11 your sister to use her car? 12 A No. 13 Q And is she paying for any other car or 14 does she have another car she can use? 15 A She has another car. 16 Q And do you know how many car payments 17 have been deferred? 18 A Three, I think.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th. Q Would you normally keep the rent money in the car, in your car? A Normally? I don't know if I'd say normally. She gave it to me. I had it in the car. Q Well, let me ask you this, do you have a safe in your home? A Yes, but I don't put rent money in my safe at home. Q Do you keep jewelry in the safe or valuable documents or what do you keep in the safe? A To be honest with you, I have \$2 bills in	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them? 9 A No. 10 Q And just to be clear, you're not paying 11 your sister to use her car? 12 A No. 13 Q And is she paying for any other car or 14 does she have another car she can use? 15 A She has another car. 16 Q And do you know how many car payments 17 have been deferred? 18 A Three, I think. 19 Q Have those been three consecutive
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A At her house. Q Is that in Virginia? A Winchester, Virginia. Q And what day was it normal that you'd be picking up the rent from her in the middle of the month? A Most of the tenants don't pay until the 10th. Q Would you normally keep the rent money in the car, in your car? A Normally? I don't know if I'd say normally. She gave it to me. I had it in the car. Q Well, let me ask you this, do you have a safe in your home? A Yes, but I don't put rent money in my safe at home. Q Do you keep jewelry in the safe or valuable documents or what do you keep in the safe? A To be honest with you, I have \$2 bills in my safe at home right now.	1 payments deferred. I'm paying car insurance. 2 Q Has there been any negative action on 3 your credit in the last year that you know of? 4 A My credit score has dropped. 5 Q And why is that? 6 A Because of the balance. 7 Q To your knowledge, has PenFed declared a 8 default of any of your loans with them? 9 A No. 10 Q And just to be clear, you're not paying 11 your sister to use her car? 12 A No. 13 Q And is she paying for any other car or 14 does she have another car she can use? 15 A She has another car. 16 Q And do you know how many car payments 17 have been deferred? 18 A Three, I think. 19 Q Have those been three consecutive 20 payments?

	1,10110101,1,1,000	_		
	58			60
1	for the month of for the next month?	₁	A No.	
2	A I don't know yet.	2	Q You stated that what has been marked as	
3	Q Is it just the bank tells you every month	3	Mahdavi well, in Exhibit Number 3, what is the	
4	whether they need you to pay or not?	4	very first page of Exhibit 3, that's your	
5	A I haven't heard back yet.	5	Certificate of Title. Is that the only evidence of	
6	Q And when you did hear of course don't	6	title that you've seen regarding the BMW to date?	
	tell me anything that your attorney told you, but	7	A Yes.	
7				
8	when you did hear that you were going to have	8	Q Do you have any indication that NextGear	
9	payments deferred, was it someone other than your	9	ever authorized the sale of the BMW to anybody?	
10	attorney who told you that?	10	A Repeat your question.	
11	A No.	11	Q Do you have any evidence to indicate that	
12	Q Were there any other conversations you	12	NextGear ever authorized the sale of the BMW to	
13	had prior to the repossession I'll say prior to	13	anybody?	
14	the purchase of the vehicle with your husband about	14	MR. LEVINE: Objection to form.	
15	the procedure for purchasing the car that we	15	THE WITNESS: I don't know. I don't	
16	haven't talked about today?	16	not that I know of. I don't know.	
17	A No.	17	BY MR. MARKELS:	
18	MR. BRAGDON: I'll go over my notes. I	18	Q All right. Have you seen as part of the	
19	may not have very many more questions for you. I	19	document production in this case prior title held	
20	think it will make sense to let Mr. Markels see if	20	by NextGear to the BMW?	
21	he has any questions.	21	A No. Have I seen it?	
22	MR. MARKELS: I do. Do you want to look	22	Q Yes.	
	59			61
1		١.	A No	61
1 2	over your notes first before I ask my questions?	1	A No. O You've not seen any of the document	61
2	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll	١.	Q You've not seen any of the document	61
2 3	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay.	1 2 3	Q You've not seen any of the document production that NextGear produced in this case?	61
2	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll	1 2 3 4	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but	61
2 3 4	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT,	1 2 3 4 5	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't	61
2 3 4 5	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS:	1 2 3 4 5 6	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember.	61
2 3 4	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is	1 2 3 4 5 6 7	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any	61
2 3 4 5 6 7	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc.	1 2 3 4 5 6 7 8	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name?	61
2 3 4 5 6 7 8	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that	1 2 3 4 5 6 7 8 9	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No.	61
2 3 4 5 6 7 8 9	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear.	1 2 3 4 5 6 7 8 9	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a	61
2 3 4 5 6 7 8 9 10	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear. You said that you did not fill out the	1 2 3 4 5 6 7 8 9 10	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a Certificate of Title from the Maryland Vehicle	61
2 3 4 5 6 7 8 9 10 11	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear. You said that you did not fill out the application for title for the BMW, correct?	1 2 3 4 5 6 7 8 9 10 11 12	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a Certificate of Title from the Maryland Vehicle Administration you have to submit prior title?	61
2 3 4 5 6 7 8 9 10 11 12	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear. You said that you did not fill out the application for title for the BMW, correct? A Yes.	1 2 3 4 5 6 7 8 9 10 11 12 13	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a Certificate of Title from the Maryland Vehicle Administration you have to submit prior title? MR. LEVINE: Objection, speculation.	61
2 3 4 5 6 7 8 9 10 11 12 13	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear. You said that you did not fill out the application for title for the BMW, correct? A Yes. Q Do you know who did?	1 2 3 4 5 6 7 8 9 10 11 12 13 14	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a Certificate of Title from the Maryland Vehicle Administration you have to submit prior title? MR. LEVINE: Objection, speculation. BY MR. MARKELS:	61
2 3 4 5 6 7 8 9 10 11 12 13 14	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear. You said that you did not fill out the application for title for the BMW, correct? A Yes. Q Do you know who did? A I don't know. I my husband, I assume.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a Certificate of Title from the Maryland Vehicle Administration you have to submit prior title? MR. LEVINE: Objection, speculation. BY MR. MARKELS: Q Are you aware?	61
2 3 4 5 6 7 8 9 10 11 12 13 14 15	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear. You said that you did not fill out the application for title for the BMW, correct? A Yes. Q Do you know who did? A I don't know. I my husband, I assume. Q You assume your husband or somebody at BW	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a Certificate of Title from the Maryland Vehicle Administration you have to submit prior title? MR. LEVINE: Objection, speculation. BY MR. MARKELS: Q Are you aware? A No.	61
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear. You said that you did not fill out the application for title for the BMW, correct? A Yes. Q Do you know who did? A I don't know. I my husband, I assume. Q You assume your husband or somebody at BW Auto Outlet?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a Certificate of Title from the Maryland Vehicle Administration you have to submit prior title? MR. LEVINE: Objection, speculation. BY MR. MARKELS: Q Are you aware? A No. Q Okay. Now, you say during your oh,	61
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear. You said that you did not fill out the application for title for the BMW, correct? A Yes. Q Do you know who did? A I don't know. I my husband, I assume. Q You assume your husband or somebody at BW Auto Outlet? A Yes.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a Certificate of Title from the Maryland Vehicle Administration you have to submit prior title? MR. LEVINE: Objection, speculation. BY MR. MARKELS: Q Are you aware? A No.	61
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear. You said that you did not fill out the application for title for the BMW, correct? A Yes. Q Do you know who did? A I don't know. I my husband, I assume. Q You assume your husband or somebody at BW Auto Outlet? A Yes. Q Did you ever see the application for	1 2 3 4 4 5 6 6 7 8 9 10 11 12 13 14 15 16 17	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a Certificate of Title from the Maryland Vehicle Administration you have to submit prior title? MR. LEVINE: Objection, speculation. BY MR. MARKELS: Q Are you aware? A No. Q Okay. Now, you say during your oh,	61
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear. You said that you did not fill out the application for title for the BMW, correct? A Yes. Q Do you know who did? A I don't know. I my husband, I assume. Q You assume your husband or somebody at BW Auto Outlet? A Yes.	1 2 3 4 4 5 6 7 8 8 9 10 11 12 13 14 15 16 17 18	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a Certificate of Title from the Maryland Vehicle Administration you have to submit prior title? MR. LEVINE: Objection, speculation. BY MR. MARKELS: Q Are you aware? A No. Q Okay. Now, you say during your oh, did you ever have a conversation with your husband	61
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear. You said that you did not fill out the application for title for the BMW, correct? A Yes. Q Do you know who did? A I don't know. I my husband, I assume. Q You assume your husband or somebody at BW Auto Outlet? A Yes. Q Did you ever see the application for	1 2 3 4 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a Certificate of Title from the Maryland Vehicle Administration you have to submit prior title? MR. LEVINE: Objection, speculation. BY MR. MARKELS: Q Are you aware? A No. Q Okay. Now, you say during your oh, did you ever have a conversation with your husband or anyone at BW Auto Outlet about who the prior	61
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	over your notes first before I ask my questions? MR. BRAGDON: I'll just wait for I'll ask after you, if that's okay. EXAMINATION BY COUNSEL FOR DEFENDANT, P.A.R. BY MR. MARKELS: Q Good morning, Ms. Mahdavi. My name is James Markels. I represent P.A.R. Services, Inc. I just have a few questions just to make sure that the record is clear. You said that you did not fill out the application for title for the BMW, correct? A Yes. Q Do you know who did? A I don't know. I my husband, I assume. Q You assume your husband or somebody at BW Auto Outlet? A Yes. Q Did you ever see the application for title?	1 2 3 4 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q You've not seen any of the document production that NextGear produced in this case? It's not before you, but A I may have. I don't remember. I don't remember. Q Okay. You do not remember seeing any Certificate of Title to the BMW in NextGear's name? A No. Q Are you aware that in order to get a Certificate of Title from the Maryland Vehicle Administration you have to submit prior title? MR. LEVINE: Objection, speculation. BY MR. MARKELS: Q Are you aware? A No. Q Okay. Now, you say during your oh, did you ever have a conversation with your husband or anyone at BW Auto Outlet about who the prior owner of the BMW was?	61

		1		
	62			64
1	car, right?		A Yes.	
2	A Yes.	2	Q Did you review this document before you	
3	Q Was it your assumption when you purchased	3	signed it?	
4	it that BW Auto Outlet was the owner of the car?	4	A Did I read all of it, no.	
5	A Yes, I assumed BW was the owner of the	5	Q Was it your understanding that the cash	
6	car.	6	price of the vehicle at \$71,995 was the accurate	
7	Q Okay. Did you ever at any time ask them	7	agreed-to sale price for the BMW?	
8	to see title to the car in their name?	8	A Yes.	
9	A No.	9	Q Now, if you look down, you will see	
10	Q Was that ever provided to you?	10	various charges, including things like Dealer	
11	A No.	11	Processing Charge, PDI Fee, Registration Fee, Title	
12	Q Did they ever make that representation to	12	Fee, and so forth, right?	
13	you?	13	A Yes.	
14	A No.	14	Q Do you see where it says, "Less:	
15	Q Now, you said that the address on the	15	Trade-In Allowance"? Do you see where it says	
16	Maryland Certificate of Title for the BMW in your	16	that?	
17	name, that address is simply a prior address that	17	A Yes.	
18	Maryland had on file for you?	18	Q Do you see where it says \$22,500 next to	
19	A Uh-huh.	19	that, right?	
20	Q That's a yes?	20	A Yes.	
21	A Yes.	21	Q Was it your understanding that that was a	
22	Q And that was for which car?	22	credit to you for the trade-in of the GLK?	
	And that was for which car:	22	credit to you for the dade-in of the GER:	
		ı		
	63			65
1	A The address?	1	A Yes.	65
1 2		1 2	A Yes.Q And, in fact, that GLK is the vehicle	65
	A The address?			65
2	A The address? Q Yes.		Q And, in fact, that GLK is the vehicle	65
2 3	A The address?Q Yes.A It was for the GLK.	2 3	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle	65
2 3 4	A The address?Q Yes.A It was for the GLK.Q Now, speaking of the GLK, you said that	2 3 4	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct?	65
2 3 4 5	 A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as 	2 3 4 5	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes.	65
2 3 4 5 6	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct?	2 3 4 5 6	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance	65
2 3 4 5 6 7	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes.	2 3 4 5 6 7	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right?	65
2 3 4 5 6 7 8	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what	2 3 4 5 6 7 8	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes.	65
2 3 4 5 6 7 8 9	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what is Mahdavi 19? Do you see that?	2 3 4 5 6 7 8 9	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes. Q Now, if you look under where it says the	65
2 3 4 5 6 7 8 9	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what is Mahdavi 19? Do you see that? A Yes.	2 3 4 5 6 7 8 9	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes. Q Now, if you look under where it says the "Less: Trade-In Allowance" of \$22,500 right below	65
2 3 4 5 6 7 8 9 10 11	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what is Mahdavi 19? Do you see that? A Yes. Q Is that the Retail Purchase Agreement for	2 3 4 5 6 7 8 9 10	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes. Q Now, if you look under where it says the "Less: Trade-In Allowance" of \$22,500 right below that on the right-hand side, it also says, "Plus:	65
2 3 4 5 6 7 8 9 10 11 12	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what is Mahdavi 19? Do you see that? A Yes. Q Is that the Retail Purchase Agreement for the BMW?	2 3 4 5 6 7 8 9 10 11 12	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes. Q Now, if you look under where it says the "Less: Trade-In Allowance" of \$22,500 right below that on the right-hand side, it also says, "Plus: Balance Owed on Trade-In," right?	65
2 3 4 5 6 7 8 9 10 11 12 13	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what is Mahdavi 19? Do you see that? A Yes. Q Is that the Retail Purchase Agreement for the BMW? A Yes.	2 3 4 5 6 7 8 9 10 11 12 13	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes. Q Now, if you look under where it says the "Less: Trade-In Allowance" of \$22,500 right below that on the right-hand side, it also says, "Plus: Balance Owed on Trade-In," right? A Yes.	65
2 3 4 5 6 7 8 9 10 11 12 13 14	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what is Mahdavi 19? Do you see that? A Yes. Q Is that the Retail Purchase Agreement for the BMW? A Yes. Q It was your understanding is that your	2 3 4 5 6 7 8 9 10 11 12 13	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes. Q Now, if you look under where it says the "Less: Trade-In Allowance" of \$22,500 right below that on the right-hand side, it also says, "Plus: Balance Owed on Trade-In," right? A Yes. Q And there it says \$34,966, right?	65
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what is Mahdavi 19? Do you see that? A Yes. Q Is that the Retail Purchase Agreement for the BMW? A Yes. Q It was your understanding is that your signature on the bottom left?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes. Q Now, if you look under where it says the "Less: Trade-In Allowance" of \$22,500 right below that on the right-hand side, it also says, "Plus: Balance Owed on Trade-In," right? A Yes. Q And there it says \$34,966, right? A Uh-huh.	65
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what is Mahdavi 19? Do you see that? A Yes. Q Is that the Retail Purchase Agreement for the BMW? A Yes. Q It was your understanding is that your signature on the bottom left? A Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes. Q Now, if you look under where it says the "Less: Trade-In Allowance" of \$22,500 right below that on the right-hand side, it also says, "Plus: Balance Owed on Trade-In," right? A Yes. Q And there it says \$34,966, right? A Uh-huh. Q So in actuality to trade-in your car	65
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what is Mahdavi 19? Do you see that? A Yes. Q Is that the Retail Purchase Agreement for the BMW? A Yes. Q It was your understanding is that your signature on the bottom left? A Yes. Q If you would turn it over to Mahdavi 20,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes. Q Now, if you look under where it says the "Less: Trade-In Allowance" of \$22,500 right below that on the right-hand side, it also says, "Plus: Balance Owed on Trade-In," right? A Yes. Q And there it says \$34,966, right? A Uh-huh. Q So in actuality to trade-in your car would cost you an additional \$12,466, right?	65
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what is Mahdavi 19? Do you see that? A Yes. Q Is that the Retail Purchase Agreement for the BMW? A Yes. Q It was your understanding is that your signature on the bottom left? A Yes. Q If you would turn it over to Mahdavi 20, was the information on the back of this also part	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes. Q Now, if you look under where it says the "Less: Trade-In Allowance" of \$22,500 right below that on the right-hand side, it also says, "Plus: Balance Owed on Trade-In," right? A Yes. Q And there it says \$34,966, right? A Uh-huh. Q So in actuality to trade-in your car would cost you an additional \$12,466, right? A Yes.	65
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what is Mahdavi 19? Do you see that? A Yes. Q Is that the Retail Purchase Agreement for the BMW? A Yes. Q It was your understanding is that your signature on the bottom left? A Yes. Q If you would turn it over to Mahdavi 20, was the information on the back of this also part of that retail sales agreement?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes. Q Now, if you look under where it says the "Less: Trade-In Allowance" of \$22,500 right below that on the right-hand side, it also says, "Plus: Balance Owed on Trade-In," right? A Yes. Q And there it says \$34,966, right? A Uh-huh. Q So in actuality to trade-in your car would cost you an additional \$12,466, right? A Yes. Q So in order to purchase the BMW, you put	65
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A The address? Q Yes. A It was for the GLK. Q Now, speaking of the GLK, you said that originally your intention was to trade it in as part of the purchase for the BMW, correct? A Yes. Q Could you look on Exhibit Number 3, what is Mahdavi 19? Do you see that? A Yes. Q Is that the Retail Purchase Agreement for the BMW? A Yes. Q It was your understanding is that your signature on the bottom left? A Yes. Q If you would turn it over to Mahdavi 20, was the information on the back of this also part of that retail sales agreement? A Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q And, in fact, that GLK is the vehicle described under where it says "Trade-In Vehicle Information" to the left of that, correct? A Yes. Q And that shows the trade-in allowance there and the balance owned and lienholder, right? A Yes. Q Now, if you look under where it says the "Less: Trade-In Allowance" of \$22,500 right below that on the right-hand side, it also says, "Plus: Balance Owed on Trade-In," right? A Yes. Q And there it says \$34,966, right? A Uh-huh. Q So in actuality to trade-in your car would cost you an additional \$12,466, right? A Yes. Q So in order to purchase the BMW, you put in \$23,000 as a down payment and then PenFed had to	65

	177611667 17 50 61	г —		1
	66			68
1	balance owed on your trade-in, right?	1	against BW Outlet for failure to sell you good	
2	A Yes.	2	title to the BMW?	
3	Q And, in fact, if we look at what is	3	MR. LEVINE: Objection, foundation.	
4	Mahdavi 79, if you would take a look at that.	4	BY MR. MARKELS:	
5	A Uh-huh.	5	Q Go ahead and answer.	
6	Q That is the check you produced that was	6	A No, I have not. Not yet.	
7	issued by Pentagon Federal Credit Union in the	7	Q Have you discussed with your husband why	
8	amount of \$64,941.70, right?	8	BW Auto Outlet has not paid you the \$12,466?	
9	A Yes.	9	A No.	
10	Q So they paid the amount that is set forth	10	Q You have not?	
11	on Mahdavi 19, correct?	11	A No.	
12	A Yes.	12	Q Do you know if he still works there?	
13	Q Now, you've said that in May of 2014,	13	A I don't know. Not that I know of. I	
14	some two months after this Retail Purchase	14	don't think it's there anymore.	
15	Agreement was signed, and two months a month	15	Q You don't think it's a going concern	
16	after the Pentagon Federal Credit Union check was	16	anymore?	
17	issued that the trade-in fell through, the GLK came	17	A No, I don't I don't think BW is there	
18	back to your house?	18	anymore.	
19	A I don't remember exactly when the GLK	19	Q I'm sorry. What do you mean by that?	
20	came back or when the trade-in didn't happen. I	20	A I don't know. I don't think my husband	
21	didn't know that the trade-in didn't happen. My	21	works there anymore.	
22	husband is the one that knew that the trade-in	22	Q You think it's out of business, closed up	
	67			69
1	didn't happen. So he brought the GLK came home.	1	shop?	
2	Q All right. And you still have title to	2	A I don't know anything about BW. I don't	
3	the GLK, correct?	3	know if it's in business or if it's not in	
4	A Yes.	4	business.	
5	Q So I'm going to ask you, what happened to	5	Q Okay. Did your husband ever tell you	
6	the \$12,466 that should have been refunded?	6	that he was fired from BW Auto Outlet or that	
7	A I am out that \$12,000.	7	A No, he did not say he was fired from BW	
8	Q And who has that money?	8	Auto Outlet.	
9	A Baltimore Washington.	9	Q Okay. Now, you say you don't know	
1.0				
10	Q BW Auto Outlet, right?	10	anything about his income?	
10	Q BW Auto Outlet, right? A Yes.	10 11	anything about his income? A That's what I said, yes.	
1		l		
11	A Yes.	11	A That's what I said, yes.	
11 12	A Yes.Q And have you requested that they refund	11 12	A That's what I said, yes. Q And so you don't know whether he was ever paid from BW Auto Outlet? A He was paid from BW.	
11 12 13	A Yes. Q And have you requested that they refund you that money?	11 12 13	A That's what I said, yes. Q And so you don't know whether he was ever paid from BW Auto Outlet?	
11 12 13 14	A Yes. Q And have you requested that they refund you that money? A Not yet. I mean, I'm just trying to get	11 12 13 14	A That's what I said, yes. Q And so you don't know whether he was ever paid from BW Auto Outlet? A He was paid from BW.	
11 12 13 14 15	A Yes. Q And have you requested that they refund you that money? A Not yet. I mean, I'm just trying to get my car back is my first step, but, yes, I'm out	11 12 13 14 15	A That's what I said, yes. Q And so you don't know whether he was ever paid from BW Auto Outlet? A He was paid from BW. Q How much?	
11 12 13 14 15 16	A Yes. Q And have you requested that they refund you that money? A Not yet. I mean, I'm just trying to get my car back is my first step, but, yes, I'm out that \$12,000.	11 12 13 14 15 16	A That's what I said, yes. Q And so you don't know whether he was ever paid from BW Auto Outlet? A He was paid from BW. Q How much? A I have no idea. Q How do you know he was paid? A I've seen a W-2.	
11 12 13 14 15 16 17	A Yes. Q And have you requested that they refund you that money? A Not yet. I mean, I'm just trying to get my car back is my first step, but, yes, I'm out that \$12,000. Q And you have not filed any suit to	11 12 13 14 15 16 17	A That's what I said, yes. Q And so you don't know whether he was ever paid from BW Auto Outlet? A He was paid from BW. Q How much? A I have no idea. Q How do you know he was paid?	
11 12 13 14 15 16 17 18	A Yes. Q And have you requested that they refund you that money? A Not yet. I mean, I'm just trying to get my car back is my first step, but, yes, I'm out that \$12,000. Q And you have not filed any suit to recover that \$12,466?	11 12 13 14 15 16 17 18	A That's what I said, yes. Q And so you don't know whether he was ever paid from BW Auto Outlet? A He was paid from BW. Q How much? A I have no idea. Q How do you know he was paid? A I've seen a W-2.	
11 12 13 14 15 16 17 18 19	A Yes. Q And have you requested that they refund you that money? A Not yet. I mean, I'm just trying to get my car back is my first step, but, yes, I'm out that \$12,000. Q And you have not filed any suit to recover that \$12,466? A I just told you, I'm trying to get my car back. Yes, I yes, I would like to get that \$12,000 back, too.	11 12 13 14 15 16 17 18 19	A That's what I said, yes. Q And so you don't know whether he was ever paid from BW Auto Outlet? A He was paid from BW. Q How much? A I have no idea. Q How do you know he was paid? A I've seen a W-2. Q So you've seen paperwork from BW Auto	
11 12 13 14 15 16 17 18 19 20	A Yes. Q And have you requested that they refund you that money? A Not yet. I mean, I'm just trying to get my car back is my first step, but, yes, I'm out that \$12,000. Q And you have not filed any suit to recover that \$12,466? A I just told you, I'm trying to get my car back. Yes, I yes, I would like to get that	11 12 13 14 15 16 17 18 19 20	A That's what I said, yes. Q And so you don't know whether he was ever paid from BW Auto Outlet? A He was paid from BW. Q How much? A I have no idea. Q How do you know he was paid? A I've seen a W-2. Q So you've seen paperwork from BW Auto Outlet indicating that they have paid monies to	

		_		
	70			72
1	it, but I have no idea, like, how much it was.	1	insured for.	
2	Q Have you ever seen his tax returns?	2	BY MR. MARKELS:	
3	A No, we don't file joint returns.	3	Q And that insurance was for a value,	
4	Q How long have you been filing separately?	4	correct?	
5	A I don't think we've ever filed joint	5	A Yes.	
6	returns.	6	Q And that value was pursuant to the	
7	Q It's also true that the \$12,466 that BW	7	insurance company appraising the approximate value	
8	Auto Outlet has has never been paid to PenFed,	8	of the Cartier watch?	
9	right?	9	A Yes.	
10	MR. LEVINE: Objection, foundation, calls	10	Q Okay. If you have not yet given that	
11	for speculation.	11	document to your counsel, I ask that you do so,	
12	THE WITNESS: To my knowledge, it has not	12	that it be produced in this case.	
13	been paid to PenFed.	13	Now, during the date of the repossession,	
14	BY MR. BRAGDON:	14	do you agree that that occurred in the early	
15	Q You have produced as part of Exhibit	15	morning hours of May 20th of 2014?	
16	Number 3 your statements from PenFed, and if you'd	16	A May 20th, yes.	
		17		
17	like to go through them again, that's fine, but would you agree with me that none of those	1	Q Okay. Around, say, like 1:30 in the morning or something like that?	
18		18		
19	statements reflect any payment of \$12,466 to	19	A Somewhere around in there, yes.	
$\begin{vmatrix} 20 \\ 21 \end{vmatrix}$	PenFed?	20	Q You said that there were two gentlemen	
	A They do not.	21	who showed up?	
22	Q Now, you did say that at one point your	22	A Yes.	
	71			73
1	Cartier watch was appraised for insurance purposes?	1	Q Now, when did it become clear to you that	
2	A Uh-huh, yes.	2	this was a repossession of your car as opposed to	
3	Q And that you do have a copy of something,	3	just some people stealing it?	
4	one of those insurance documents that has that	4	A When they knocked on the door and asked	
5	appraisal value on it?	5	for the keys.	
6	A The insurance value that it's insured	6	Q Okay. Did they have any indicia of who	
7	for.	7	they worked for on them, on their outfits? Did	
8	Q Okay. Have you given that to your	8	they give you a card, any other information?	
9	counsel to be produced in this case as an indicator	9	A No.	
	of the Cartier watch's value?	10	Q All right. Now, did you after they	
110		1 - 0		
10	A Yes	111	left, did you chase them?	
11	A Yes. MR. MARKELS: Has that been produced.	11	left, did you chase them? A I have three kids, small kids inside.	
11 12	MR. MARKELS: Has that been produced,	12	A I have three kids, small kids inside.	
11 12 13	MR. MARKELS: Has that been produced, Counsel?	12 13	A I have three kids, small kids inside. No, I did not chase them.	
11 12 13 14	MR. MARKELS: Has that been produced, Counsel? MR. LEVINE: I don't know. I'd have to	12 13 14	A I have three kids, small kids inside. No, I did not chase them. Q Do you know if your husband ever tried to	
11 12 13 14 15	MR. MARKELS: Has that been produced, Counsel? MR. LEVINE: I don't know. I'd have to look and see what was produced.	12 13 14 15	A I have three kids, small kids inside. No, I did not chase them. Q Do you know if your husband ever tried to pursue them?	
11 12 13 14 15 16	MR. MARKELS: Has that been produced, Counsel? MR. LEVINE: I don't know. I'd have to look and see what was produced. MR. MARKELS: James, do you recall that	12 13 14 15 16	A I have three kids, small kids inside. No, I did not chase them. Q Do you know if your husband ever tried to pursue them? A My husband was not at home. I called him	
11 12 13 14 15 16 17	MR. MARKELS: Has that been produced, Counsel? MR. LEVINE: I don't know. I'd have to look and see what was produced. MR. MARKELS: James, do you recall that being in here?	12 13 14 15 16 17	A I have three kids, small kids inside. No, I did not chase them. Q Do you know if your husband ever tried to pursue them? A My husband was not at home. I called him on the phone. I don't know.	
11 12 13 14 15 16 17 18	MR. MARKELS: Has that been produced, Counsel? MR. LEVINE: I don't know. I'd have to look and see what was produced. MR. MARKELS: James, do you recall that being in here? MR. BRAGDON: We can address it, but I	12 13 14 15 16 17 18	A I have three kids, small kids inside. No, I did not chase them. Q Do you know if your husband ever tried to pursue them? A My husband was not at home. I called him on the phone. I don't know. Q Where was he at the time?	
11 12 13 14 15 16 17 18 19	MR. MARKELS: Has that been produced, Counsel? MR. LEVINE: I don't know. I'd have to look and see what was produced. MR. MARKELS: James, do you recall that being in here? MR. BRAGDON: We can address it, but I haven't seen it.	12 13 14 15 16 17 18 19	A I have three kids, small kids inside. No, I did not chase them. Q Do you know if your husband ever tried to pursue them? A My husband was not at home. I called him on the phone. I don't know. Q Where was he at the time? A I don't know. He wasn't home.	
11 12 13 14 15 16 17 18 19 20	MR. MARKELS: Has that been produced, Counsel? MR. LEVINE: I don't know. I'd have to look and see what was produced. MR. MARKELS: James, do you recall that being in here? MR. BRAGDON: We can address it, but I haven't seen it. MR. MARKELS: Okay.	12 13 14 15 16 17 18 19 20	A I have three kids, small kids inside. No, I did not chase them. Q Do you know if your husband ever tried to pursue them? A My husband was not at home. I called him on the phone. I don't know. Q Where was he at the time? A I don't know. He wasn't home. Q He wasn't at work?	
11 12 13 14 15 16 17 18 19	MR. MARKELS: Has that been produced, Counsel? MR. LEVINE: I don't know. I'd have to look and see what was produced. MR. MARKELS: James, do you recall that being in here? MR. BRAGDON: We can address it, but I haven't seen it.	12 13 14 15 16 17 18 19 20 21	A I have three kids, small kids inside. No, I did not chase them. Q Do you know if your husband ever tried to pursue them? A My husband was not at home. I called him on the phone. I don't know. Q Where was he at the time? A I don't know. He wasn't home.	

		T		
	74			76
1	Q Okay. He hadn't told you where he was?		MR. BRAGDON: The P.A.R. one.	
2	MR. LEVINE: Objection, asked and	2	THE WITNESS: It's this one.	
3	answered.	3	MR. LEVINE: Exhibit 2 is how we have it.	
4	THE WITNESS: No.	4	MR. MARKELS: Oh, you're on another	
5	BY MR. MARKELS:	5	exhibit. I thought it was switched around. That's	
6	Q All right. Now, to your knowledge,	6	fine.	
7	nobody in any vehicle or on foot pursued the men	7	THE WITNESS: Which page are we on?	
8	who repoed your car?	8	MR. LEVINE: Page 5.	
9	A No, my husband met up with the police and	9	BY MR. MARKELS:	
10	the men, the people who had the car.	10	Q Page 5. Page 5 of Exhibit 2. Now,	
11	Q Now, you said as this was going on you	11	although the copies that we have before us are not	
12	called the police, correct?	12	signed by you, you agree that you did sign these	
13	A No, I told the men standing there to	13	particular answers to these supplemental	
14	leave, that I was going to call the police, and	14	interrogatory answers, right?	
15	that's when they left.	15	A Yes.	
16	Q Did you ever did you call the police	16	Q Now, in your supplemental answer you	
17	at that time?	17	state that you received title for the BMW. Do you	
18	A No, I hung up the phone. They left	18	see that?	
19	they were leaving. I called my husband and said	19	A Yes.	
20	that they left. That's when he got on the phone	20	Q Now, when you say you received title for	
21	with the police and they tracked them down.	21	the BMW, you mean that what was in Exhibit 3 as	
22	Q To your knowledge, have the police taken	22	Mahdavi 1 was received to you in the mail, correct?	
	75			77
1		1	A Yes.	77
1 2	any action against P.A.R. Services or NextGear or	1 2		77
	any action against P.A.R. Services or NextGear or anybody else with regard to that car?	l	Q And we already talked about you did not	77
2	any action against P.A.R. Services or NextGear or	2	Q And we already talked about you did not file any application or receive prior title to the	77
2 3	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge.	2 3	Q And we already talked about you did not	77
2 3 4	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a	2 3 4	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct?	77
2 3 4 5	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on	2 3 4 5	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes.	77
2 3 4 5 6	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea?	2 3 4 5	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6	77
2 3 4 5 6 7	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know.	2 3 4 5 6 7	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under	77
2 3 4 5 6 7 8	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the	2 3 4 5 6 7 8	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and	77
2 3 4 5 6 7 8 9	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the household obligations?	2 3 4 5 6 7 8 9	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and without waiving the prior objections, on or about	77
2 3 4 5 6 7 8 9	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the household obligations? A He pays the mortgage.	2 3 4 5 6 7 8 9	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and without waiving the prior objections, on or about May 21, 2014, I spoke to Deb McCloud on the	77
2 3 4 5 6 7 8 9 10 11	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the household obligations? A He pays the mortgage. Q That's the only thing he's in charge of?	2 3 4 5 6 7 8 9 10 11	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and without waiving the prior objections, on or about May 21, 2014, I spoke to Deb McCloud on the telephone about the BMW being repossessed and she	77
2 3 4 5 6 7 8 9 10 11 12	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the household obligations? A He pays the mortgage. Q That's the only thing he's in charge of? A Yes.	2 3 4 5 6 7 8 9 10 11 12	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and without waiving the prior objections, on or about May 21, 2014, I spoke to Deb McCloud on the telephone about the BMW being repossessed and she transferred my call to Kerry Howard." Do you see	77
2 3 4 5 6 7 8 9 10 11 12 13	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the household obligations? A He pays the mortgage. Q That's the only thing he's in charge of? A Yes. Q Now, let's look at Exhibit Number 1, your answer to Interrogatory No. 7, which is on Page 5. Do you see that this is Interrogatory No. 7 about,	2 3 4 5 6 7 8 9 10 11 12 13	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and without waiving the prior objections, on or about May 21, 2014, I spoke to Deb McCloud on the telephone about the BMW being repossessed and she transferred my call to Kerry Howard." Do you see that?	77
2 3 4 5 6 7 8 9 10 11 12 13 14	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the household obligations? A He pays the mortgage. Q That's the only thing he's in charge of? A Yes. Q Now, let's look at Exhibit Number 1, your answer to Interrogatory No. 7, which is on Page 5.	2 3 4 5 6 7 8 9 10 11 12 13	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and without waiving the prior objections, on or about May 21, 2014, I spoke to Deb McCloud on the telephone about the BMW being repossessed and she transferred my call to Kerry Howard." Do you see that? A Yes.	77
2 3 4 5 6 7 8 9 10 11 12 13 14 15	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the household obligations? A He pays the mortgage. Q That's the only thing he's in charge of? A Yes. Q Now, let's look at Exhibit Number 1, your answer to Interrogatory No. 7, which is on Page 5. Do you see that this is Interrogatory No. 7 about,	2 3 4 5 6 7 8 9 10 11 12 13 14	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and without waiving the prior objections, on or about May 21, 2014, I spoke to Deb McCloud on the telephone about the BMW being repossessed and she transferred my call to Kerry Howard." Do you see that? A Yes. Q Are you sure that was on the 21st and not	77
2 3 4 5 6 7 8 9 10 11 12 13 14 15	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the household obligations? A He pays the mortgage. Q That's the only thing he's in charge of? A Yes. Q Now, let's look at Exhibit Number 1, your answer to Interrogatory No. 7, which is on Page 5. Do you see that this is Interrogatory No. 7 about, "Set forth all facts in support of the allegations	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and without waiving the prior objections, on or about May 21, 2014, I spoke to Deb McCloud on the telephone about the BMW being repossessed and she transferred my call to Kerry Howard." Do you see that? A Yes. Q Are you sure that was on the 21st and not on the 20th?	77
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the household obligations? A He pays the mortgage. Q That's the only thing he's in charge of? A Yes. Q Now, let's look at Exhibit Number 1, your answer to Interrogatory No. 7, which is on Page 5. Do you see that this is Interrogatory No. 7 about, "Set forth all facts in support of the allegations of Paragraph 31 of your complaint." Looking at	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and without waiving the prior objections, on or about May 21, 2014, I spoke to Deb McCloud on the telephone about the BMW being repossessed and she transferred my call to Kerry Howard." Do you see that? A Yes. Q Are you sure that was on the 21st and not on the 20th? A Yes. The 20th was the day the car was	77
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the household obligations? A He pays the mortgage. Q That's the only thing he's in charge of? A Yes. Q Now, let's look at Exhibit Number 1, your answer to Interrogatory No. 7, which is on Page 5. Do you see that this is Interrogatory No. 7 about, "Set forth all facts in support of the allegations of Paragraph 31 of your complaint." Looking at Exhibit Number 1.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and without waiving the prior objections, on or about May 21, 2014, I spoke to Deb McCloud on the telephone about the BMW being repossessed and she transferred my call to Kerry Howard." Do you see that? A Yes. Q Are you sure that was on the 21st and not on the 20th? A Yes. The 20th was the day the car was taken.	77
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the household obligations? A He pays the mortgage. Q That's the only thing he's in charge of? A Yes. Q Now, let's look at Exhibit Number 1, your answer to Interrogatory No. 7, which is on Page 5. Do you see that this is Interrogatory No. 7 about, "Set forth all facts in support of the allegations of Paragraph 31 of your complaint." Looking at Exhibit Number 1. MR. LEVINE: Exhibit Number 1. You mean	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and without waiving the prior objections, on or about May 21, 2014, I spoke to Deb McCloud on the telephone about the BMW being repossessed and she transferred my call to Kerry Howard." Do you see that? A Yes. Q Are you sure that was on the 21st and not on the 20th? A Yes. The 20th was the day the car was taken. Q Right, the very early morning of the	77
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	any action against P.A.R. Services or NextGear or anybody else with regard to that car? A Not to my knowledge. Q Do you know whether your husband was a salaried employee of BW Outlet or was on commission? Do you have any idea? A I don't know. Q Was he responsible for paying any of the household obligations? A He pays the mortgage. Q That's the only thing he's in charge of? A Yes. Q Now, let's look at Exhibit Number 1, your answer to Interrogatory No. 7, which is on Page 5. Do you see that this is Interrogatory No. 7 about, "Set forth all facts in support of the allegations of Paragraph 31 of your complaint." Looking at Exhibit Number 1. MR. LEVINE: Exhibit Number 1. You mean Exhibit 2?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q And we already talked about you did not file any application or receive prior title to the BMW at any time, correct? A Yes. Q All right. If you would turn to Page 6 of that same of Exhibit 2, you see where under the supplemental answer it says, "Subject to and without waiving the prior objections, on or about May 21, 2014, I spoke to Deb McCloud on the telephone about the BMW being repossessed and she transferred my call to Kerry Howard." Do you see that? A Yes. Q Are you sure that was on the 21st and not on the 20th? A Yes. The 20th was the day the car was taken. Q Right, the very early morning of the 20th, right.	77

	·	_		
	78			80
1	day of the 20th and you waited until the 21st?	1	A I don't in the other case? I don't	
2	A No, because I was waiting for my husband	2	know.	
3	to figure out what was going on.	3	Q At any time.	
4	Q Okay. So you did not alert PenFed in any	4	A I don't know.	
5	way about the repossession until the 21st? That's	5	Q Are you aware that your husband has been	
6	your position?	6	asked questions about BW Auto Outlet's practices in	
7	A Yes.	7	selling cars?	
8	Q So if PenFed had, in fact, contacted	8	A I don't I don't know.	
9	P.A.R. Services about the BMW on the 20th, it was	9	MR. LEVINE: I'm going to object to the	
10	not due to any communication by you or your	10	extent that any conversations that I may have had	
11	husband?	11	with my client about what's going on with that	
12	A It wasn't from me.	12	matter.	
13		13	BY MR. MARKELS:	
14	Q Do you know if your husband contacted PenFed?	14	Q Of course. You're aware that there is	
15	A I don't know.	l	litigation pending in Maryland between NextGear and	
16	Q Did he tell you that he ever contacted	15 16	BW Auto Outlet, correct?	
1	PenFed on the 20th?	ı		
17		17	A Just what I've seen here, yes.	
18	A He didn't tell me.	18	Q Okay. Are you aware that your husband's	
19	Q All right.	19	deposition has been taken in that case?	
20	A But I know on the next day he was trying	20	A I don't know. I don't I don't know if	
21	to figure out what happened and how to get the car	21	his deposition has been taken.	
22	back.	22	Q Okay. He's never indicated to you that	
	79			81
	79			81
1	Q Did he ever explain to you anything about	1	he was having his deposition taken or that a	81
2	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had?	1 2	deposition has happened?	81
	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and	1 2 3	deposition has happened? A No.	81
2	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered.	1 2 3 4	deposition has happened? A No. Q You understand what the Fifth Amendment	81
2 3	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No.	l -	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a	81
2 3 4 5 6	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS:	4	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn	81
2 3 4 5 6 7	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about	4 5 6 7	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony?	81
2 3 4 5 6 7 8	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan?	4 5 6 7 8	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no,	81
2 3 4 5 6 7 8 9	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No.	4 5 6 7 8 9	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really.	81
2 3 4 5 6 7 8 9 10	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to	4 5 6 7 8 9	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the	81
2 3 4 5 6 7 8 9 10 11	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to cars that were held by BW Auto Outlet were handled?	4 5 6 7 8 9 10 11	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the affidavit by Lisa Long that was attached by	81
2 3 4 5 6 7 8 9 10 11 12	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to cars that were held by BW Auto Outlet were handled? A No.	4 5 6 7 8 9	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the affidavit by Lisa Long that was attached by NextGear Capital to their Opposition to Motion for	81
2 3 4 5 6 7 8 9 10 11	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to cars that were held by BW Auto Outlet were handled? A No. Q Did he ever tell you the process by which	4 5 6 7 8 9 10 11	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the affidavit by Lisa Long that was attached by NextGear Capital to their Opposition to Motion for Preliminary Injunction filed in this case?	81
2 3 4 5 6 7 8 9 10 11 12	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to cars that were held by BW Auto Outlet were handled? A No. Q Did he ever tell you the process by which BW Auto Outlet obtained title to sell to	4 5 6 7 8 9 10 11 12	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the affidavit by Lisa Long that was attached by NextGear Capital to their Opposition to Motion for Preliminary Injunction filed in this case? A I vaguely remember seeing something, but	81
2 3 4 5 6 7 8 9 10 11 12 13	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to cars that were held by BW Auto Outlet were handled? A No. Q Did he ever tell you the process by which BW Auto Outlet obtained title to sell to purchasers?	4 5 6 7 8 9 10 11 12 13	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the affidavit by Lisa Long that was attached by NextGear Capital to their Opposition to Motion for Preliminary Injunction filed in this case?	81
2 3 4 5 6 7 8 9 10 11 12 13 14	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to cars that were held by BW Auto Outlet were handled? A No. Q Did he ever tell you the process by which BW Auto Outlet obtained title to sell to purchasers? A No.	4 5 6 7 8 9 10 11 12 13 14	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the affidavit by Lisa Long that was attached by NextGear Capital to their Opposition to Motion for Preliminary Injunction filed in this case? A I vaguely remember seeing something, but I don't without looking at it, I don't remember exactly.	81
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to cars that were held by BW Auto Outlet were handled? A No. Q Did he ever tell you the process by which BW Auto Outlet obtained title to sell to purchasers? A No. Q You're aware that your husband has pled	4 5 6 7 8 9 10 11 12 13 14 15	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the affidavit by Lisa Long that was attached by NextGear Capital to their Opposition to Motion for Preliminary Injunction filed in this case? A I vaguely remember seeing something, but I don't without looking at it, I don't remember exactly. Q Okay. Is it your understanding that	81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to cars that were held by BW Auto Outlet were handled? A No. Q Did he ever tell you the process by which BW Auto Outlet obtained title to sell to purchasers? A No. Q You're aware that your husband has pled the Fifth with regard to BW Auto Outlet sales of	4 5 6 7 8 9 10 11 12 13 14 15 16	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the affidavit by Lisa Long that was attached by NextGear Capital to their Opposition to Motion for Preliminary Injunction filed in this case? A I vaguely remember seeing something, but I don't without looking at it, I don't remember exactly.	81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to cars that were held by BW Auto Outlet were handled? A No. Q Did he ever tell you the process by which BW Auto Outlet obtained title to sell to purchasers? A No. Q You're aware that your husband has pled	4 5 6 7 8 9 10 11 12 13 14 15 16	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the affidavit by Lisa Long that was attached by NextGear Capital to their Opposition to Motion for Preliminary Injunction filed in this case? A I vaguely remember seeing something, but I don't without looking at it, I don't remember exactly. Q Okay. Is it your understanding that	81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to cars that were held by BW Auto Outlet were handled? A No. Q Did he ever tell you the process by which BW Auto Outlet obtained title to sell to purchasers? A No. Q You're aware that your husband has pled the Fifth with regard to BW Auto Outlet sales of	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the affidavit by Lisa Long that was attached by NextGear Capital to their Opposition to Motion for Preliminary Injunction filed in this case? A I vaguely remember seeing something, but I don't without looking at it, I don't remember exactly. Q Okay. Is it your understanding that NextGear Capital has taken the position in this	81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to cars that were held by BW Auto Outlet were handled? A No. Q Did he ever tell you the process by which BW Auto Outlet obtained title to sell to purchasers? A No. Q You're aware that your husband has pled the Fifth with regard to BW Auto Outlet sales of cars from its lot?	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the affidavit by Lisa Long that was attached by NextGear Capital to their Opposition to Motion for Preliminary Injunction filed in this case? A I vaguely remember seeing something, but I don't without looking at it, I don't remember exactly. Q Okay. Is it your understanding that NextGear Capital has taken the position in this case that it had the original title to this BMW and	81
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q Did he ever explain to you anything about a loan with NextGear that BW Auto had? MR. LEVINE: Objection, asked and answered. THE WITNESS: No. BY MR. MARKELS: Q Did he ever explain to you anything about a floor lease or a floor loan? A No. Q Did he ever tell you about how title to cars that were held by BW Auto Outlet were handled? A No. Q Did he ever tell you the process by which BW Auto Outlet obtained title to sell to purchasers? A No. Q You're aware that your husband has pled the Fifth with regard to BW Auto Outlet sales of cars from its lot? A I don't know.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	deposition has happened? A No. Q You understand what the Fifth Amendment of the US Constitution provides with regard to a person giving testimony under or giving sworn testimony? A Technically, no, not really. I mean, no, not really. Q All right. Have you reviewed the affidavit by Lisa Long that was attached by NextGear Capital to their Opposition to Motion for Preliminary Injunction filed in this case? A I vaguely remember seeing something, but I don't without looking at it, I don't remember exactly. Q Okay. Is it your understanding that NextGear Capital has taken the position in this case that it had the original title to this BMW and never authorized that it be sold to anybody?	81

		Г		
	82			84
1	Auto Outlet who has given any testimony or evidence	1	that.	
2	that that is incorrect?	2	Have you had any discussions with	
3	A Not that I know of.	3	Mr. Molavi about the repossession of your car?	
4	Q You own several real properties, as we've	4	A No.	
5	discussed before. Are you familiar with the term	5	Q Or Ms. Nozary?	
6	chain of title?	6	A No, I have not had any discussions with	
7	A Chain of title?	7	her.	
8	MR. LEVINE: Objection, calls for a legal	8	Q How about anyone else at BW Auto Outlet?	
9	response.	9	A No.	
10	BY MR. MARKELS:	10	Q So the only person you've talked to since	
11	Q Are you familiar with the term?	11	the repossession of your car that was affiliated	
12	A No.	12	with BW Auto Outlet at any time was your husband?	
13	Q If you look at Exhibit Number 1, that is	13	A Yes.	
14	your interrogatory answers to NextGear's requests,	14	Q Did your husband advise you to file suit	
15	Page 4. Do you see at the top it says,	15	to recover the BMW?	
16	Interrogatory No. 5?	16	MR. LEVINE: I'm going to object there on	
17	A Uh-huh.	17	spousal privilege and any conversations that would	
18	Q "State the substance of all discussions	18	have happened about what she should do.	
19	concerning the occurrence that you had with any	19	MR. MARKELS: Are you directing her not	
20	party to the case," right?	20	to answer?	
21	A Yes.	21	MR. LEVINE: I'm making the objection. I	
22	Q Do you see under the answer it says,	22	don't know what her answer is.	
	83			85
1		1	BY MR. MARKELS:	85
1 2	"Subject to and without waiving the objections, on	1 2		85
	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I	1 2 3	Q Okay. Go ahead and answer.	85
2	"Subject to and without waiving the objections, on	ı	Q Okay. Go ahead and answer.A I don't really know. I mean, I think we	85
2 3	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see	3	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't	85
2 3 4	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that?	3 4	Q Okay. Go ahead and answer.A I don't really know. I mean, I think we	85
2 3 4 5	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes.	3 4 5	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to	85
2 3 4 5 6	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did	3 4 5 6	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back.	85
2 3 4 5 6 7	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on	3 4 5 6 7	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit?	85
2 3 4 5 6 7 8	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on May 20th?	3 4 5 6 7 8	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit? A Yes, he's aware.	85
2 3 4 5 6 7 8 9	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on May 20th? A May 20th is was it Tuesday? I'd have	3 4 5 6 7 8 9	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit? A Yes, he's aware. Q Did he ever express any concerns to you	85
2 3 4 5 6 7 8 9 10	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on May 20th? A May 20th is was it Tuesday? I'd have to look at a calendar. Was May 21st a Tuesday?	3 4 5 6 7 8 9 10	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit? A Yes, he's aware. Q Did he ever express any concerns to you about this lawsuit?	85
2 3 4 5 6 7 8 9 10	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on May 20th? A May 20th is was it Tuesday? I'd have to look at a calendar. Was May 21st a Tuesday? Q Let me just verify that really quickly if	3 4 5 6 7 8 9 10 11	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit? A Yes, he's aware. Q Did he ever express any concerns to you about this lawsuit? A Concerns, no. Q Okay. What efforts did you and your husband take in order to recover the BMW?	85
2 3 4 5 6 7 8 9 10 11 12	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on May 20th? A May 20th is was it Tuesday? I'd have to look at a calendar. Was May 21st a Tuesday? Q Let me just verify that really quickly if that would help. May 21st is a Wednesday, was a Wednesday. A So then it is May 20th.	3 4 5 6 7 8 9 10 11 12	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit? A Yes, he's aware. Q Did he ever express any concerns to you about this lawsuit? A Concerns, no. Q Okay. What efforts did you and your	85
2 3 4 5 6 7 8 9 10 11 12 13	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on May 20th? A May 20th is was it Tuesday? I'd have to look at a calendar. Was May 21st a Tuesday? Q Let me just verify that really quickly if that would help. May 21st is a Wednesday, was a Wednesday. A So then it is May 20th. Q Okay. Now, since the repossession of	3 4 5 6 7 8 9 10 11 12 13	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit? A Yes, he's aware. Q Did he ever express any concerns to you about this lawsuit? A Concerns, no. Q Okay. What efforts did you and your husband take in order to recover the BMW? A I mean, I know he contacted people to try to get the car back.	85
2 3 4 5 6 7 8 9 10 11 12 13 14	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on May 20th? A May 20th is was it Tuesday? I'd have to look at a calendar. Was May 21st a Tuesday? Q Let me just verify that really quickly if that would help. May 21st is a Wednesday, was a Wednesday. A So then it is May 20th. Q Okay. Now, since the repossession of your car, what has your husband told you with	3 4 5 6 7 8 9 10 11 12 13 14	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit? A Yes, he's aware. Q Did he ever express any concerns to you about this lawsuit? A Concerns, no. Q Okay. What efforts did you and your husband take in order to recover the BMW? A I mean, I know he contacted people to try to get the car back. Q Who did he contact?	85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on May 20th? A May 20th is was it Tuesday? I'd have to look at a calendar. Was May 21st a Tuesday? Q Let me just verify that really quickly if that would help. May 21st is a Wednesday, was a Wednesday. A So then it is May 20th. Q Okay. Now, since the repossession of your car, what has your husband told you with regard to regarding the title to the BMW?	3 4 5 6 7 8 9 10 11 12 13 14 15	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit? A Yes, he's aware. Q Did he ever express any concerns to you about this lawsuit? A Concerns, no. Q Okay. What efforts did you and your husband take in order to recover the BMW? A I mean, I know he contacted people to try to get the car back. Q Who did he contact? A I don't know who his contacts are. I	85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on May 20th? A May 20th is was it Tuesday? I'd have to look at a calendar. Was May 21st a Tuesday? Q Let me just verify that really quickly if that would help. May 21st is a Wednesday, was a Wednesday. A So then it is May 20th. Q Okay. Now, since the repossession of your car, what has your husband told you with regard to regarding the title to the BMW? A He hasn't told me anything.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit? A Yes, he's aware. Q Did he ever express any concerns to you about this lawsuit? A Concerns, no. Q Okay. What efforts did you and your husband take in order to recover the BMW? A I mean, I know he contacted people to try to get the car back. Q Who did he contact? A I don't know who his contacts are. I contacted Pentagon Federal.	85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on May 20th? A May 20th is was it Tuesday? I'd have to look at a calendar. Was May 21st a Tuesday? Q Let me just verify that really quickly if that would help. May 21st is a Wednesday, was a Wednesday. A So then it is May 20th. Q Okay. Now, since the repossession of your car, what has your husband told you with regard to regarding the title to the BMW? A He hasn't told me anything. Q Have you asked him whether or not you	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit? A Yes, he's aware. Q Did he ever express any concerns to you about this lawsuit? A Concerns, no. Q Okay. What efforts did you and your husband take in order to recover the BMW? A I mean, I know he contacted people to try to get the car back. Q Who did he contact? A I don't know who his contacts are. I contacted Pentagon Federal. Q And that was on May 21st?	85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on May 20th? A May 20th is was it Tuesday? I'd have to look at a calendar. Was May 21st a Tuesday? Q Let me just verify that really quickly if that would help. May 21st is a Wednesday, was a Wednesday. A So then it is May 20th. Q Okay. Now, since the repossession of your car, what has your husband told you with regard to regarding the title to the BMW? A He hasn't told me anything. Q Have you asked him whether or not you have good title to the BMW?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit? A Yes, he's aware. Q Did he ever express any concerns to you about this lawsuit? A Concerns, no. Q Okay. What efforts did you and your husband take in order to recover the BMW? A I mean, I know he contacted people to try to get the car back. Q Who did he contact? A I don't know who his contacts are. I contacted Pentagon Federal. Q And that was on May 21st? A Yes, since the car was taken on the 20th;	85
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	"Subject to and without waiving the objections, on or about May 21, 2014, around one in the morning, I was at home and my doorbell rang." Do you see that? A Yes. Q It's your understanding now that it did not happen on May 21st? It actually happened on May 20th? A May 20th is was it Tuesday? I'd have to look at a calendar. Was May 21st a Tuesday? Q Let me just verify that really quickly if that would help. May 21st is a Wednesday, was a Wednesday. A So then it is May 20th. Q Okay. Now, since the repossession of your car, what has your husband told you with regard to regarding the title to the BMW? A He hasn't told me anything. Q Have you asked him whether or not you	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q Okay. Go ahead and answer. A I don't really know. I mean, I think we tried to get the car back, and when that didn't happen, this was our next step, to legally try to go get the car back. Q So he is aware of this lawsuit? A Yes, he's aware. Q Did he ever express any concerns to you about this lawsuit? A Concerns, no. Q Okay. What efforts did you and your husband take in order to recover the BMW? A I mean, I know he contacted people to try to get the car back. Q Who did he contact? A I don't know who his contacts are. I contacted Pentagon Federal. Q And that was on May 21st?	85

	<u> </u>	Г		
	86			88
1	to you know, Kerry Howard was trying to get the	1	Q Did she ever send you any documentation	
2	car back for me.	2	from MVA regarding the BMW?	
3	Q Who?	3	A No.	
4	A Kerry Howard at Pentagon Federal was	4	Q Did you ever have any phone conversation	
5	trying to get the car back.	5	with Kerry Howard or anyone else over at PenFed	
6	Q What did she tell you about those	6	about tracking down prior owners who the prior	
7	efforts?	7	owners were for the BMW, either through the MVA or	
8	A She said that she couldn't get NextGear	8	other means?	
9	to respond to her, and then, you know, when she did	9	A No.	
10	get NextGear to respond, they said that they	10	Q To date, has PenFed ever indicated to you	
11	couldn't speak to her because, you know, of the	11	that BW Auto Outlet ever had good title to the BMW?	
12	case. So it just kind of spiraled to where we are	12	MR. LEVINE: Objection, foundation.	
13	now. I bought a car; I haven't seen my car in six	13	BY MR. MARKELS:	
14	months; I want my car back.	14	Q Has PenFed ever told you that?	
15	Q Did Pentagon Federal ever tell you that	15	A I haven't asked.	
16	NextGear did not have title to the car?	16	Q Okay. Are you aware that Mr. Molavi, the	
17	A No.	17	owner of BW Auto Outlet, has also pled the Fifth	
18	Q Did NextGear ever I mean, did Pentagon	18	with regard to sales of vehicles by BW Auto Outlet?	
19	Federal ever tell you that you were sold good title	19	MR. LEVINE: Objection, foundation,	
20	to the car?	20	hearsay.	
21	A She never said that.	21	BY MR. MARKELS:	
22	Q All right. Did you ever undertake to	22	Q Are you aware?	
		┢		
	87			89
1		1	A No	89
1 2	investigate where your title was derived from, who	1 2	A No. MR MARKELS: I think that's all I have	89
2	investigate where your title was derived from, who the prior owner of the BMW was before you owned it?	2	MR. MARKELS: I think that's all I have	89
2 3	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I	2 3	MR. MARKELS: I think that's all I have at this time. Did you review your notes?	89
2 3 4	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that.	2 3 4	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other	89
2 3 4 5	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland	2 3 4 5	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions.	89
2 3 4 5 6	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed	2 3 4 5 6	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right.	89
2 3 4 5 6 7	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW?	2 3 4 5 6 7	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF	89
2 3 4 5 6 7 8	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that.	2 3 4 5 6 7 8	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE:	89
2 3 4 5 6 7 8 9	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay.	2 3 4 5 6 7	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of	89
2 3 4 5 6 7 8 9	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay. A She was doing that.	2 3 4 5 6 7 8 9	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of damages, did you do any did you purchase	89
2 3 4 5 6 7 8 9	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay. A She was doing that. Q And what did she tell you that she found?	2 3 4 5 6 7 8 9	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of damages, did you do any did you purchase anything for the BMW after any parts for the BMW	89
2 3 4 5 6 7 8 9 10 11	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay. A She was doing that. Q And what did she tell you that she found?	2 3 4 5 6 7 8 9 10	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of damages, did you do any did you purchase	89
2 3 4 5 6 7 8 9 10 11 12	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay. A She was doing that. Q And what did she tell you that she found? A She sent me everything that she had. Is her letter in here?	2 3 4 5 6 7 8 9 10 11 12	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of damages, did you do any did you purchase anything for the BMW after any parts for the BMW after you purchased it? A Two new tires.	89
2 3 4 5 6 7 8 9 10 11 12 13	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay. A She was doing that. Q And what did she tell you that she found? A She sent me everything that she had. Is her letter in here?	2 3 4 5 6 7 8 9 10 11 12 13	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of damages, did you do any did you purchase anything for the BMW after any parts for the BMW after you purchased it? A Two new tires.	89
2 3 4 5 6 7 8 9 10 11 12 13 14	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay. A She was doing that. Q And what did she tell you that she found? A She sent me everything that she had. Is her letter in here? Q Can you direct me to where her if you could look through Exhibit 3, you say her letter is	2 3 4 5 6 7 8 9 10 11 12 13	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of damages, did you do any did you purchase anything for the BMW after any parts for the BMW after you purchased it? A Two new tires. Q And what did you pay for those tires? A \$725 roughly.	89
2 3 4 5 6 7 8 9 10 11 12 13 14 15	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay. A She was doing that. Q And what did she tell you that she found? A She sent me everything that she had. Is her letter in here? Q Can you direct me to where her if you	2 3 4 5 6 7 8 9 10 11 12 13 14	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of damages, did you do any did you purchase anything for the BMW after any parts for the BMW after you purchased it? A Two new tires. Q And what did you pay for those tires? A \$725 roughly.	89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay. A She was doing that. Q And what did she tell you that she found? A She sent me everything that she had. Is her letter in here? Q Can you direct me to where her if you could look through Exhibit 3, you say her letter is in here. If you could direct me to where that	2 3 4 5 6 7 8 9 10 11 12 13 14 15	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of damages, did you do any did you purchase anything for the BMW after any parts for the BMW after you purchased it? A Two new tires. Q And what did you pay for those tires? A \$725 roughly. Q Okay. And do you have the receipt?	89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay. A She was doing that. Q And what did she tell you that she found? A She sent me everything that she had. Is her letter in here? Q Can you direct me to where her if you could look through Exhibit 3, you say her letter is in here. If you could direct me to where that letter is.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of damages, did you do any did you purchase anything for the BMW after any parts for the BMW after you purchased it? A Two new tires. Q And what did you pay for those tires? A \$725 roughly. Q Okay. And do you have the receipt? A I do.	89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay. A She was doing that. Q And what did she tell you that she found? A She sent me everything that she had. Is her letter in here? Q Can you direct me to where her if you could look through Exhibit 3, you say her letter is in here. If you could direct me to where that letter is. A That's all she	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of damages, did you do any did you purchase anything for the BMW after any parts for the BMW after you purchased it? A Two new tires. Q And what did you pay for those tires? A \$725 roughly. Q Okay. And do you have the receipt? A I do. Q Okay. And when did you	89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay. A She was doing that. Q And what did she tell you that she found? A She sent me everything that she had. Is her letter in here? Q Can you direct me to where her if you could look through Exhibit 3, you say her letter is in here. If you could direct me to where that letter is. A That's all she Q You're looking at Mahdavi 78?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of damages, did you do any did you purchase anything for the BMW after any parts for the BMW after you purchased it? A Two new tires. Q And what did you pay for those tires? A \$725 roughly. Q Okay. And do you have the receipt? A I do. Q Okay. And when did you A \$745.	89
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	investigate where your title was derived from, who the prior owner of the BMW was before you owned it? A I don't even know how to do that. I don't know where to begin to do that. Q You never went to the MVA, the Maryland Vehicle Administration, to find out who had filed previously any title with regard to the BMW? A No, Kerry Howard did that. Q Okay. A She was doing that. Q And what did she tell you that she found? A She sent me everything that she had. Is her letter in here? Q Can you direct me to where her if you could look through Exhibit 3, you say her letter is in here. If you could direct me to where that letter is. A That's all she Q You're looking at Mahdavi 78? A Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	MR. MARKELS: I think that's all I have at this time. Did you review your notes? MR. BRAGDON: I don't have any other questions. MR. MARKELS: All right. EXAMINATION BY COUNSEL FOR PLAINTIFF BY MR. LEVINE: Q Ms. Mahdavi, going back to the issue of damages, did you do any did you purchase anything for the BMW after any parts for the BMW after you purchased it? A Two new tires. Q And what did you pay for those tires? A \$725 roughly. Q Okay. And do you have the receipt? A I do. Q Okay. And when did you A \$745. Q And when did you purchase the tires?	89

		Т		
	9	0		92
1	A April.		(Signature not waived.)	
2	Q In 2014?	2	(Whereupon, at 11:56 a.m., the deposition	
3	A Yes.	3	of JODI C. MAHDAVI was concluded.)	
4	Q Okay. And are you including that in your	4	of Jobi C. White Tive was concluded.)	
5	damages?	5	* * * *	
6	A Yes.	6		
7	MR. LEVINE: That's the only question	7		
8	I've got.	8		
9	EXAMINATION BY COUNSEL FOR DEFENDANT,			
	P.A.R.	10		
10	BY MR. MARKELS:	11		
11	Q Just one more thing. I'm sorry, but just	12		
12	one more. Approximately how much you've made a	13		
13	request for attorney's fees in this case. Can you	14		
14	tell me approximately how much you've paid so far	15		
15	in attorney's fees on this case?	16		
16	MR. LEVINE: Well, I'll object to the	17		
17	extent that	18		
18	BY MR. MARKELS:	19		
19	Q I'm not asking for any specifics about	20		
20	what was done or anything like that. I'm just	21		
21	trying to get the number, a ballpark.	22		
22	A I have paid I haven't paid all of my	122		
	9	1		93
	9	1		93
1	bills.	1	CERTIFICATE OF NOTARY PUBLIC	
2	Q But how much have you incurred to date?	2	I, CHRISTY MCGEE, the officer before whom	
		4	i, critical i interesse, une critical cereire whem	
3	A Incurred to date or how much I've paid to	3	the foregoing statement was taken, do hereby	
3 4	A Incurred to date or how much I've paid to date?		the foregoing statement was taken, do hereby certify that the statement was taken by me in	
		3	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting	
4	date?	3 4	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a	
5	date? Q Let's start with just incurred.	3 4 5	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither	
4 5 6	date? Q Let's start with just incurred. A Incurred? I don't want to guess because	3 4 5 6 7 8	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the	
4 5 6 7	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number.	3 4 5 6 7 8 9	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was	
4 5 6 7 8	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000?	3 4 5 6 7 8 9	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or	
4 5 6 7 8 9	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000? A Yes.	3 4 5 6 7 8 9 10	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the	
4 5 6 7 8 9 10	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000? A Yes. Q More than \$30,000?	3 4 5 6 7 8 9 10 11 12	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise	
4 5 6 7 8 9 10 11	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000? A Yes. Q More than \$30,000? A Yes.	3 4 5 6 7 8 9 10 11 12 13	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the	
4 5 6 7 8 9 10 11 12	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000? A Yes. Q More than \$30,000? A Yes. Q More than \$40,000?	3 4 5 6 7 8 9 10 11 12 13 14	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise	
4 5 6 7 8 9 10 11 12 13	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000? A Yes. Q More than \$30,000? A Yes. Q More than \$40,000? A I believe so.	3 4 5 6 7 8 9 10 11 12 13 14 15	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise	
4 5 6 7 8 9 10 11 12 13 14	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000? A Yes. Q More than \$30,000? A Yes. Q More than \$40,000? A I believe so. Q So not \$50,000 less than \$50,000?	3 4 5 6 7 8 9 10 11 12 13 14 15 16	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise	
4 5 6 7 8 9 10 11 12 13 14 15	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000? A Yes. Q More than \$30,000? A Yes. Q More than \$40,000? A I believe so. Q So not \$50,000 less than \$50,000? A I'd say close.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.	
4 5 6 7 8 9 10 11 12 13 14 15 16	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000? A Yes. Q More than \$30,000? A Yes. Q More than \$40,000? A I believe so. Q So not \$50,000 less than \$50,000? A I'd say close. Q So \$40,000 to \$60,000?	3 4 5 6 7 8 9 10 11 12 13 14 15 16	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action. CHRISTY MCGEE	
4 5 6 7 8 9 10 11 12 13 14 15 16	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000? A Yes. Q More than \$30,000? A Yes. Q More than \$40,000? A I believe so. Q So not \$50,000 less than \$50,000? A I'd say close. Q So \$40,000 to \$60,000? A Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.	
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000? A Yes. Q More than \$30,000? A Yes. Q More than \$40,000? A I believe so. Q So not \$50,000 less than \$50,000? A I'd say close. Q So \$40,000 to \$60,000? A Yes. Q A fair ballpark. And then how much have	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action. CHRISTY MCGEE Notary Public in and for the	
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000? A Yes. Q More than \$30,000? A Yes. Q More than \$40,000? A I believe so. Q So not \$50,000 less than \$50,000? A I'd say close. Q So \$40,000 to \$60,000? A Yes. Q A fair ballpark. And then how much have you actually paid?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action. CHRISTY MCGEE Notary Public in and for the Commonwealth of Virginia	
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	date? Q Let's start with just incurred. A Incurred? I don't want to guess because I I don't know the exact number. Q More than \$20,000? A Yes. Q More than \$30,000? A Yes. Q More than \$40,000? A I believe so. Q So not \$50,000 less than \$50,000? A I'd say close. Q So \$40,000 to \$60,000? A Yes. Q A fair ballpark. And then how much have you actually paid? A Ten.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	the foregoing statement was taken, do hereby certify that the statement was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said statement is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this statement was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action. CHRISTY MCGEE Notary Public in and for the Commonwealth of Virginia My commission expires:	

	9.		96
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	I, JODI C. MAHDAVI, do hereby acknowledge I have read and examined the foregoing pages of testimony, and the same is a true, correct and complete transcription of the testimony given by me, and any changes or corrections, if any, appear in the attached errata sheet signed by me. Date JODI C. MAHDAVI	22 33 44 55 66 77 88 99 100 111 122 133 144 155 166 177 188 199 200	ERRATA SHEET Case Name: JODI C. MAHDAVI vs. NEXTGEAR & P.A.R. Witness Name: JODI C. MAHDAVI Deposition Date: WEDNESDAY, NOVEMBER 12, 2014 Page No. Line No. Change/Reason for Change
20 21		21	
22		22	2 Signature Date
	9.	5	
1	Jonathan E. Levine, Esquire Levine, Daniels & Allnutt, PLLC		
3	Heritage Square, 5311 Lee Highway Arlington, Virginia 22207		
4	IN RE: Jodi C. Mahdavi vs. NextGear Capital & PAR		
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Dear Mr. Levine: Enclosed please find your copy of the deposition of JODI C. MAHDAVI, along with the original signature page. As agreed, you will be responsible for contacting the witness regarding signature. Within 21 days of November 25, 2014, please forward errata sheet and original signed signature page to counsel for Defendants, James Bragdon, Esq. If you have any questions, please do not hesitate to call. Thank you. Yours, Christy McGee, CSR Reporter/Notary cc: James Bragdon, Esq.		